



**NIOSH**  
**Public Meeting**

**Proposed CBRN**  
**Full- Facepiece**  
**APR Standard**



# Lessons Being Learned

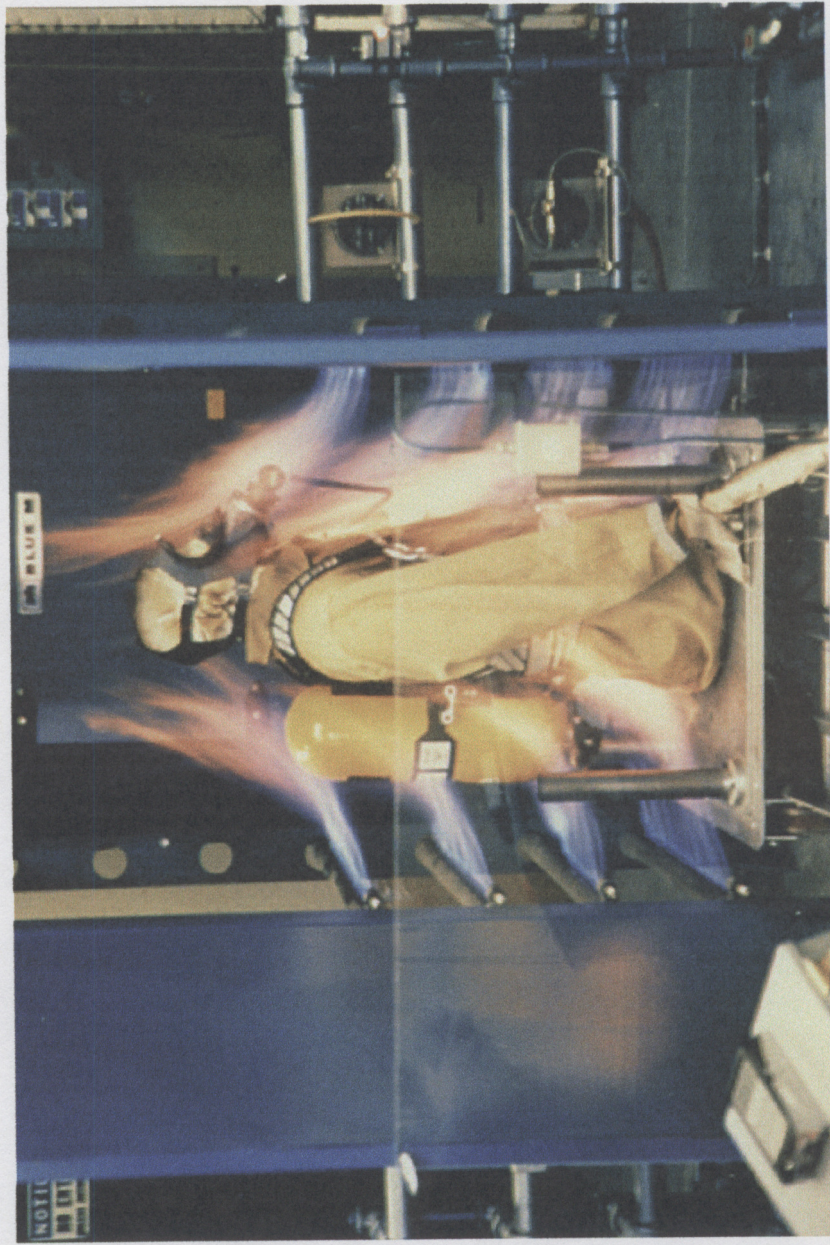
## CBRN Standard for SCBA



NIOSH will follow a flexible program for test and evaluation of SCBA for a limited period of 1 year.

# Lessons Being Learned

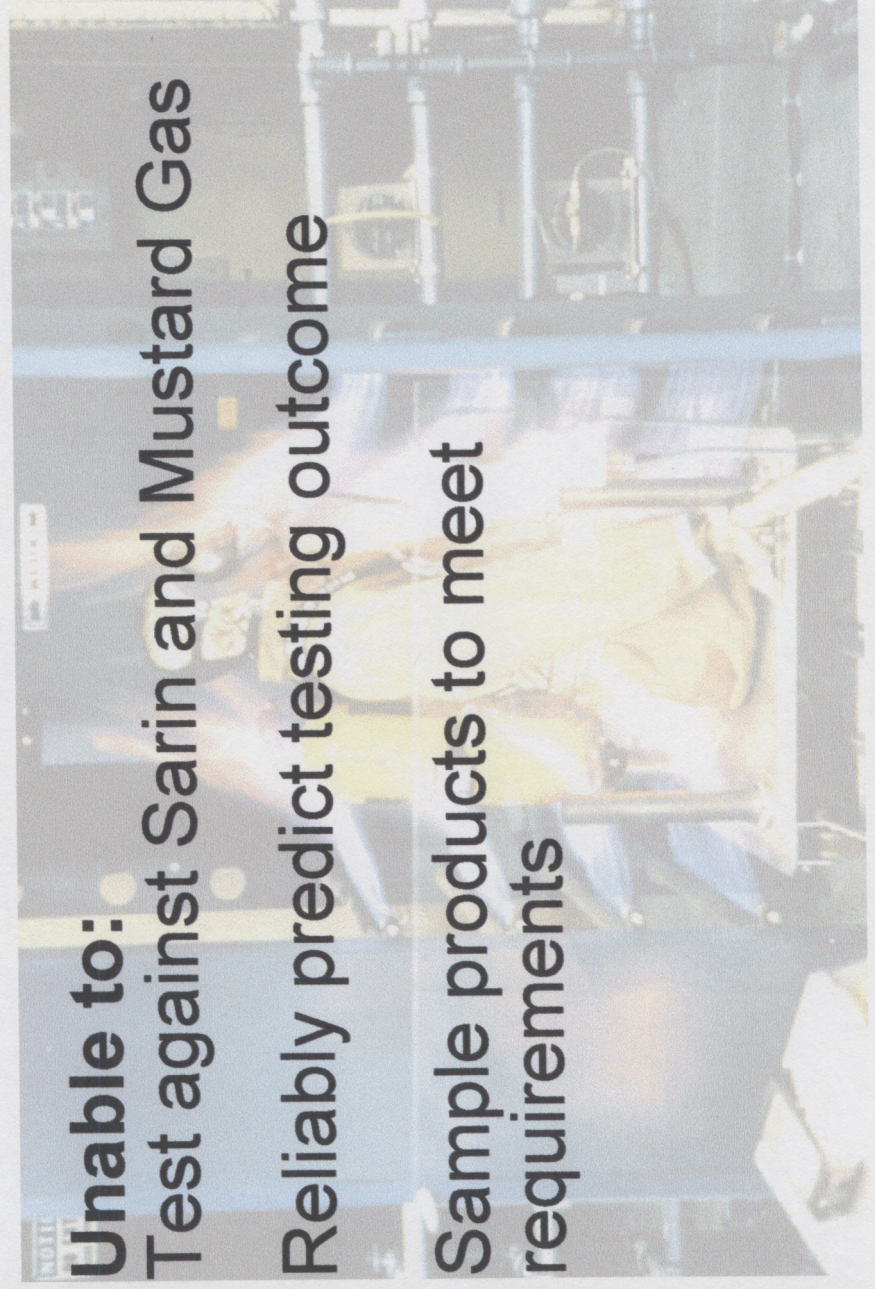
## CBRN Standard for SCBA





# Lessons Being Learned

## CBRN Standard for SCBA



**Unable to:**  
Test against Sarin and Mustard Gas

Reliably predict testing outcome

Sample products to meet requirements



# Lessons Being Learned

CBRN Standard for SCBA

**1** **Priority**

Identify & Recognize Surrogate Agents

The graphic is overlaid on a photograph of a person in a yellow hazmat suit. The number '1' is large and orange with a black outline and a jagged bottom edge. Below it is a black hash symbol '#'. To the right of the '1' is the word 'Priority' in a bold, orange, sans-serif font. The background text 'Identify & Recognize Surrogate Agents' is in a bold, black, sans-serif font.



# Lessons Being Learned

CBRN Standard for SCBA

## Identify & Recognize Surrogate Agents

Continue flexible SCBA CBRN approval process.

Follow a similar path for the CBRN full facepiece air purifying respirator standard.

# Lessons Being Learned

## Publicly Validate Protocol

- Results and test repeatability must be trusted
- CBRN SCBA protocol was inadequately validated
- Thoroughly validate the process and publish the results



# Lessons Being Learned

## Opportunity to Comment

- Most likely use scenario and rationale behind conditions
- Avoid unacceptable market conditions







# Proposed CBRN Full-Facepiece APR Standard

➤ Identification and acceptance of surrogate agents

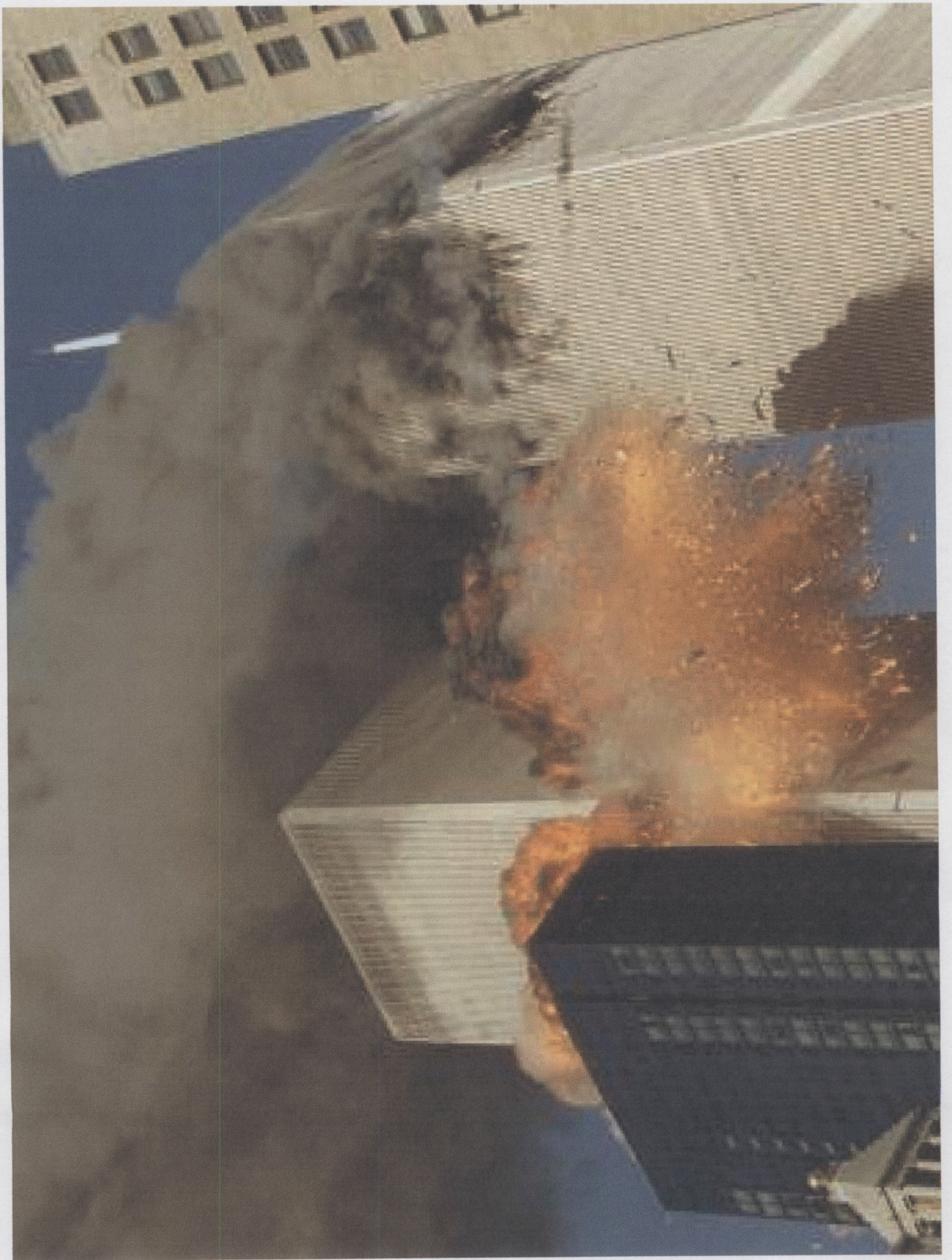
#1 Priority



# Proposed CBRN Full-Facepiece APR Standard

✘ **NIOSH should not regulate interchangeability**

**Section (6)(a)**  
**Interchangeable consumable filter cartridges and canisters**







## Reflections on September 11th

- Transportation infrastructure in the United States was shut down
- PPE needs filled locally
- Improve availability by creating stockpiles
- 100,000 Respirators & 200,000 Cartridges shipped to WTC in first 48 hours
- Not a supply issue, logistic & training issue

## Reflections on September 11th

- Multiple government agencies were taking responsibility
- Rescue workers did not know where to get the products
- Not familiar with product use and maintenance requirements
- Develop an emergency logistics program to address large-scale events




## Proposed CBRN Full-Facepiece APR Standard

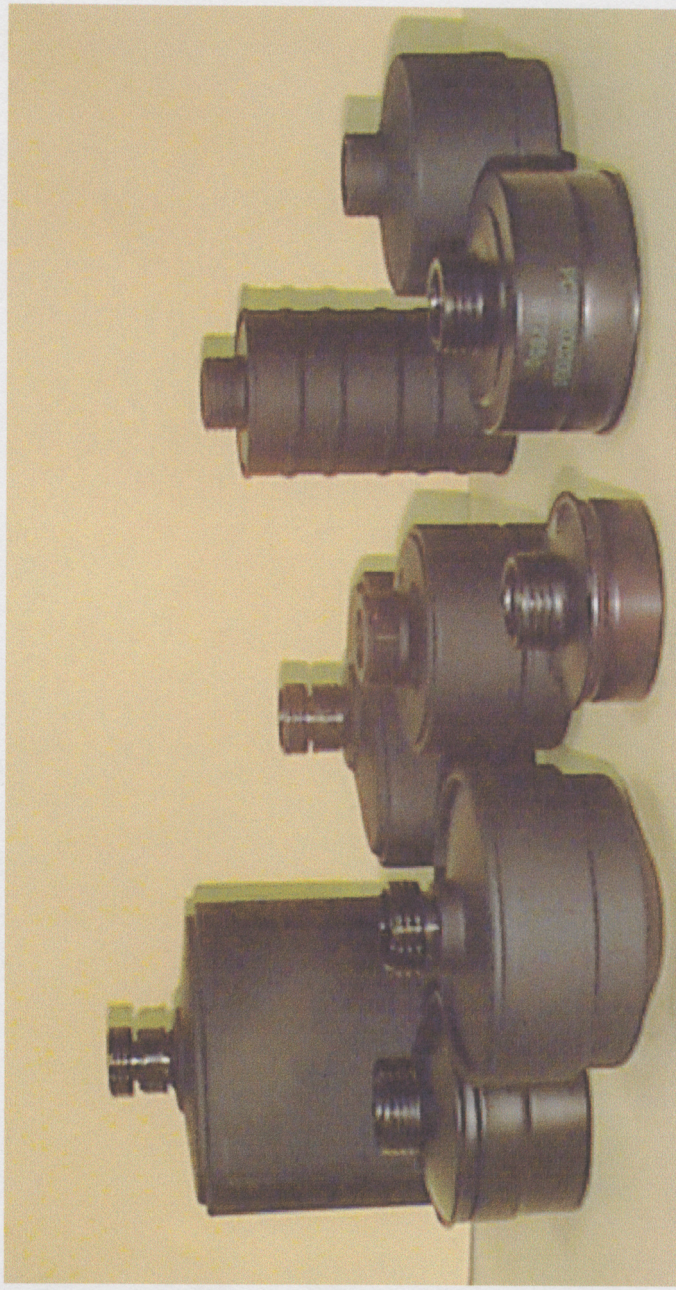
- ✂ **NIOSH should not regulate interchangeability**
- **MSA fully supports the comments by the ISEA**
- **Respirator developed as a system**
- **Mixing manufacturer components will not provide the desired results**





# Proposed CBRN Full-Facepiece APR Standard

 **NIOSH should not regulate interchangeability**



# Proposed CBRN Full-Facepiece APR Standard

✘ **NIOSH should not regulate interchangeability**

- **NIOSH should maintain a systems level approval approach focusing on performance, not design**
- **NIOSH should support the development of emergency logistics programs**





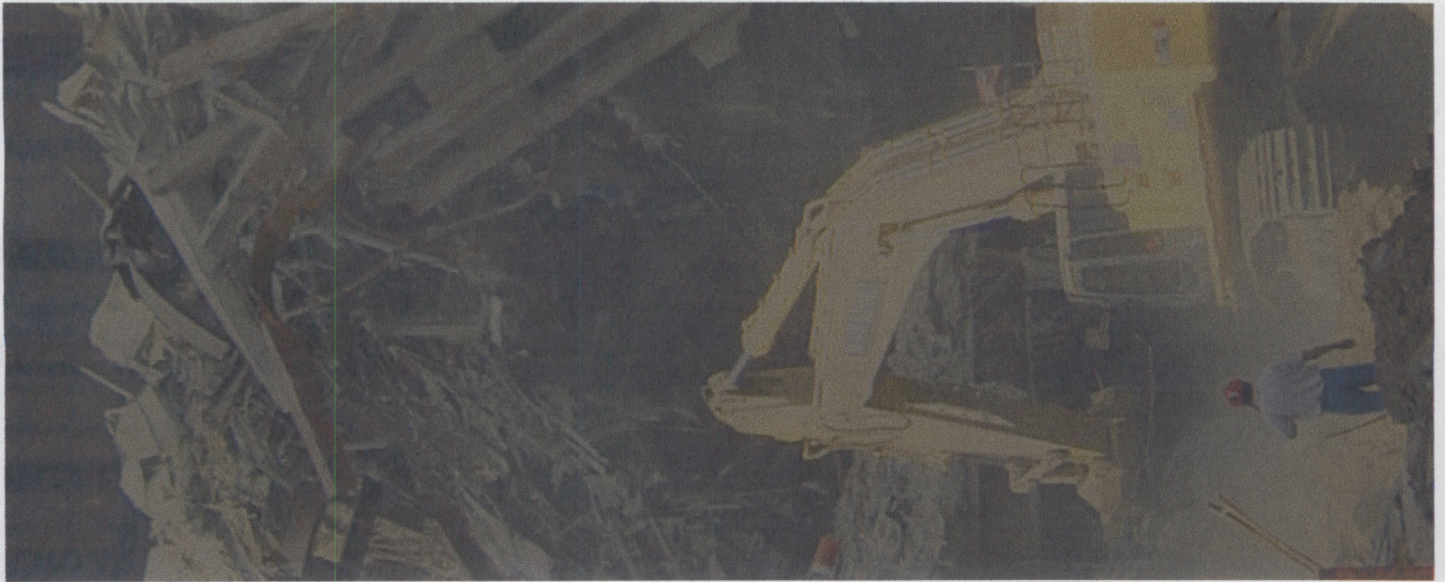
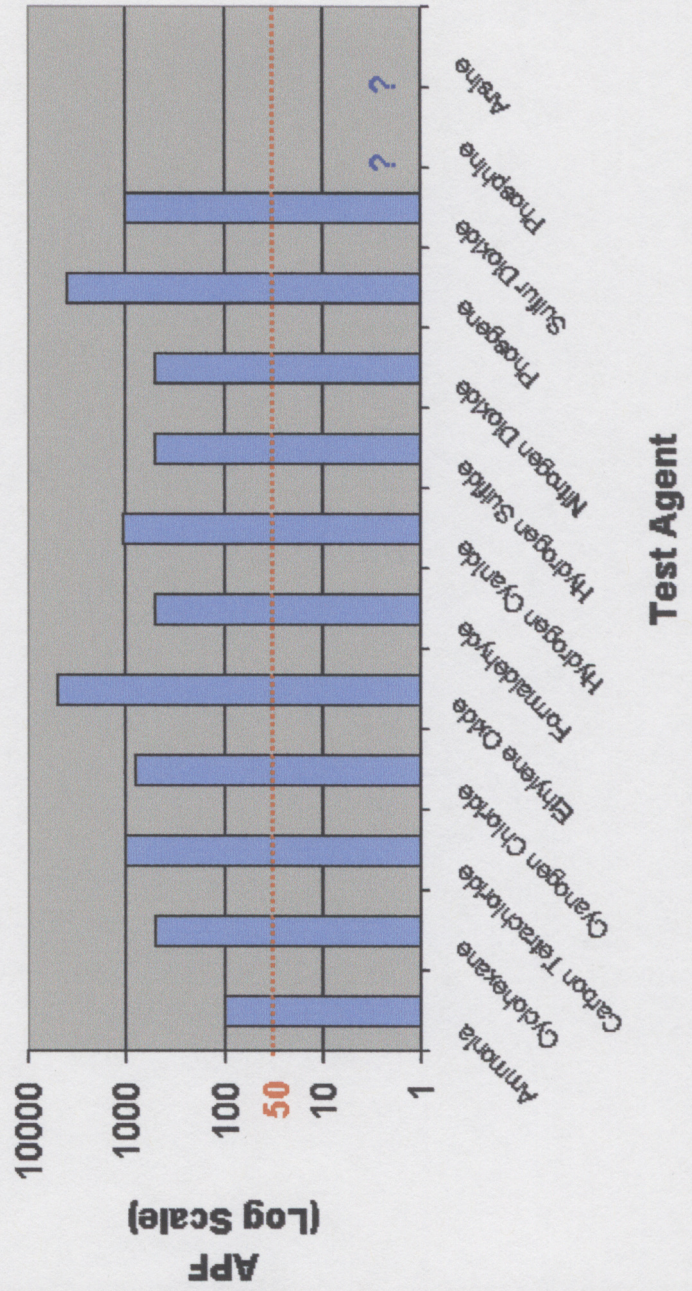
## Proposed CBRN Full-Facepiece APR Standard

- ❖ **NIOSH should not recommend or approve air-purifying respirators for entrance or use in IDLH or unknown atmospheres**
- **Beyond accepted use conditions of Air Purifying Respirators**
- **Forces test concentrations beyond accepted Assigned Protection Factors**


# Proposed CBRN Full-Facepiece APR Standard

## CBRN APR Concerns

APF Based on Test Concentration



# Proposed CBRN Full-Facepiece APR Standard

 **NIOSH should not recommend or approve air-purifying respirators for entrance or use in IDLH or unknown atmospheres**

- **SCBA with chemically protective clothing are the only responsible recommendation**



# Proposed CBRN Full-Facepiece APR Standard

- ✂ NIOSH should follow a formal rule making process
- Details of the standard not final
- New respirator category worthy of a formal rule making process



## Proposed CBRN Full-Facepiece APR Standard

- MSA supports the comments provided by the ISEA
- Recommend that NIOSH positions search for acceptable surrogates as their number one priority
- Maintain focus on performance requirements
- Do not approve any APR for entrance or use in IDLH or unknown atmospheres
- Follow formal rule making process





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