

Field of View Issue

The FOV requirement as it is written in the September 16, 2002 version of the CBRN Concept will not allow many proven dual ocular full-face respirators to be approved as CBRN respirators.

There are likely many potential users of the CBRN approved respirator. Some user groups may prefer a full facepiece with a very wide field of vision. Many of these facepieces have a visor which extends out from the eyes by a considerable distance. As a consequence this limits the ability for these types of products to interface with vision-enhancing equipment such as binoculars and night vision imaging systems. Other user groups that require more interface with these sighting systems may prefer dual ocular facepieces which can readily accommodate them. Unlike single lens systems, many dual lens systems have a bellows arrangement that can move in and out to support the interface with vision-enhancing equipment.

Recommendation: Adjust the requirement to allow the already existing and proven dual ocular facepieces to meet it.

Thread Design

Millions of full-face respirators designed with a DIN style thread have been used for years in military and industrial applications. There are several existing standards with specifications for DIN threads. Simply adapting the EN 148-1 thread requirements as proposed by NIOSH would exclude many respirators, such as the M40, designed for and used by the US Military and first responders.

Recommendation: Adjust the requirement to allow the existing and proven respirators to meet it.