

Miller, Diane M.

From: Ernest Kortschak [kortschak@evac-u8.com]
Sent: Friday, July 25, 2003 5:09 PM
To: NIOSH Docket Office
Cc: Randy Templeton (E-mail); "Kortschak, Ernest"
Subject: CBRN Air-Purifying Escape Respirator Standard: June 30, 2003 DRAFT - Carbon Monoxide Requirement

Part 1: Section 2 (c): Escape Respirator Multi Gas/Vapor/Particulate GENERAL Category with carbon Monoxide Requirements.

The draft implies that a single result greater than the 350ppm maximum would constitute a failure. There are established International Standards where by a time weighted average approach is specified which has an established history of providing adequate protection. Most CO removing technologies are catalytic and have an associated short term "peak" at initiation. A single result criteria may preclude the use of these technologies, even though there is an established history of good protection.

Please consider changing the failure criteria to reflect EN403, Clause 5.5.2.4, whereby the inhaled air shall not exceed the maximum breakthrough concentration time weighted average in any single 10 minute period.

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Miller, Diane M.

From: Ernest Kortschak [kortschak@evac-u8.com]
Sent: Friday, July 25, 2003 5:16 PM
To: NIOSH Docket Office
Cc: "Kortschak, Ernest"; Randy Templeton (E-mail)
Subject: CBRN Air-Purifying Escape Respirator Standard: June 30, 2003 DRAFT - Chemical Agent Permeation and Penetration Resistance

Please clarify the relationship between vapor challenge test duration and minimum service life.

At the June 25th forum it was understood that a respirator being certified for 30 minutes should be challenged for 60 minutes. The June 30 DRAFT implies, to some, that a 30 minute certification requires 15 minutes of challenge.

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Miller, Diane M.

From: Ernest Kortschak [kortschak@evac-u8.com]
Sent: Friday, July 25, 2003 5:50 PM
To: NIOSH Docket Office
Cc: "Kortschak, Ernest"; Randy Templeton (E-mail)
Subject: CBRN Air-Purifying Escape Respirator Standard: June 30, 2003 DRAFT - Flammability

Question 1:

The current DRAFT (Section 6h) references EN136, specifying a distance separating the outer surface of the escape respirator and the burner to 250 mm. In reviewing EN136 (Clause 8.5.1.3) a distance between the respirator and the burner is specified as 20 mm.

Please confirm the test procedure relating to the distance the two components are separated by.

Question 2:

Though the test methodology between the referenced EN136 and the CBRN DRAFT standard is similar, the failure criterion between the two standards are different. If the intent is to have a fully functioning respirator after flame exposure the test methodology may be overly severe.

International standards such as the referenced EN136 standard has a established record of providing safe performance. It is our recommendation that it be adopted it is entirety.

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