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DEPARTMENT OF THE NAVY  
 NAVAL SEA SYSTEMS COMMAND  
 WASHINGTON, DC 20362-5101

IN REPLY REFER TO

1988 JAN 14 PM 2:16

NIOSH

10470  
 OPR: 55X24  
 SER 55X2/314  
 7 January 1988

NIOSH Dockett Office  
 Mail Stop E-23  
 1600 Clifton Road, N.E.  
 Atlanta, GA 30333

Subj: PROPOSED RULE CHANGES TO 30 CFR PART 11; CERTIFICATION  
 OF PERMISSIBILITY OF RESPIRATORY PROTECTIVE DEVICES

1. We have recently become aware of your proposed changes to 30 CFR as put forth in 42 CFR Part 84 dated August 27, 1987. We have reviewed the proposed document, and question the requirement to limit the maximum oxygen content to 30% (Appendix A, Section (j)(3)).
2. The Naval Sea Systems Command Damage Control and Safety Division is responsible for the development and in-service support of fire fighting breathing equipment for the United States Navy.
3. The U.S. Navy has used a highly "pure" oxygen (75-90%) fire fighting breathing device for nearly 50 years, including tens of thousands of our Oxygen Breathing Apparatuses in literally millions of fire fighting and live fire training situations. We are not aware of any problems with the "pure" oxygen system, either with the breathing of the oxygen itself or with increased susceptibility to combustion due to the oxygen.
4. We request you investigate removing the maximum oxygen concentration from the proposal. Failure to do so may result in a long term cost impact to the U.S. Navy in the \$100 Million range.
5. Also, the proposal references MIL-O-15633 in several places. We have cancelled MIL-O-15633 and replaced it with performance requirements in MIL-C-17671E, "Canister, Oxygen Breathing Apparatus".
6. Our point of contact is Mr. B. Kozlowski, SEA 55X24, A/V 222-0324, commercial (202)-692-0324.

S. HERMAN  
 Director, Damage Control  
 And Safety Division

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Copy to:  
NCSC Code 3410  
NRL Code 6120