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October 14, 1996

NIOSH Docket Office
Robert A. Taft Laboratories
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4676 Columbia Parkway
Cincinnati, OH 45226

Dear Mr. Berry Ann:

Per our telephone conversation on October 8, 1996, MST hereby respectively submits the following comments regarding NIOSH procedures for certifying respiratory devices as requested in the Federal Register, Vol. 61, No. 96, Thursday, May 16, 1996.

The particular concern we have is the "Priority of Technical Modules", Part III, "B" Issue 4, page 24723.

We feel that it is imperative that criteria be developed to test and certify Breathing Air Purification systems used to help fulfill the requirements under 29 CFR 1910.134(d)(2)(ii).

Many manufacturer's have been producing such filtration systems for many years, and there are several systems found in the workplace boasting the fact that they "produce" Grade D breathing air, however many such systems indicate in the "fine print" that Grade D air must be entering the filtering system. This being the case, there doesn't seem to be a need to add additional cost to a respiratory system by adding such filtration systems.

A set of test criteria should be developed to verify that such systems do add benefit to the overall protection of the worker. Currently, such devices fall outside of NIOSH regulations due to the fact that NIOSH does not have any test criteria to develop such a regulation, nor does NIOSH's mandate include such devices.

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Test criteria could be economically developed from various sources that have been gathering information for many years. Such information could easily be gathered from data bases that have been accumulated by independent testing laboratories throughout the United States and Canada during the certification process of breathing air.

Typically, ambient air samples are gathered at the inlet of the compressed air system and compared to the point of use air going to the supplied air respiratory system. This valuable information could be used to develop test criteria to evaluate the breathing air purification systems, and thus determine if they do add benefit to the protection of the worker.

Additionally, there are several new products on the market allowing users to utilize a single hose system for supplying breathing air to their supplied air respirator, while simultaneously supplying air to some type of air operated tool (sanders, grinders, blow and paint guns, etc.). NIOSH currently frowns on the use of these types of devices since they loose control over the hoses used to provide air to such devices. Many of them do not have any safety devices needed to prevent back-flow contamination or proper air regulation to the supplied air respirator. Current NIOSH mandate does not allow such devices to be tested, however several are manufactured and in use today. Even when used with the NIOSH approved air supply hoses, the fact that Grade D air must enter the approved hose assemblies makes use of such systems seem rather redundant.

As a manufacturer of breathing air purification systems, MST recommends the following protocol be developed to establish a new Module regarding the above issues:

- 1.) Develop a standard for the amount of filtration/purification that a breathing air purifier must achieve.
- 2.) Develop test criteria to perform testing on such devices.
 - a.) Maximum permissible inlet contamination level(s).
 - b.) Necessary mechanical safety devices.
- 3.) Develop certification parameters for certifying such devices.
- 4.) Develop criteria for using such devices, limitations, etc., and determine what types of respirators can be used with each device.

The above represents a overall testing/certification program, however on a very "general" basis.

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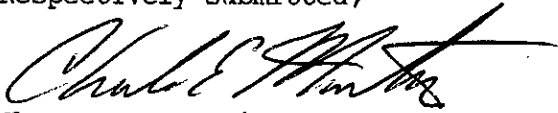
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MST, Inc. has been developing and manufacturing such devices for the past ten (10) years, and will be happy to assist NIOSH with the development of such a program, supplying test samples, historical data, technical assistance, etc.

Should you have any questions, or require additional information, please do not hesitate to contact us.

Thank you.

Respectively submitted,

A handwritten signature in black ink, appearing to read "Charles E. Martin". The signature is stylized and cursive.

Charles E. Martin, P.E.
President, MST, Inc.