

TO: Luanne Freund and John Skaryak

FROM: Terry Cloonan

CC: Beverly Gullledge and James Buswell

DATE: 4/12/2001

SUBJECT: Federal Register: March 21, 2001 (Volume 66, Number 55) Notices, NIOSH Announcement of Public Meeting To Discuss Potential Standards or Guidelines for Respiratory Protective Devices Against Chemical, Biological and Radiological (CBR) Agents--- Scott Input to the Public Meeting

1. In accordance with a request made by Mr. Wayne Davis, Program Manager for NBC Defense, US Army Soldier and Biological Chemical Command (SBCCOM) during the recent Natick conference, the following issues are recommended for Scott Health and Safety input as public comment to the upcoming NIOSH/NIST/SBCCOM Public Meeting, 17-18 April 2001.
 - a. What type of specific service life requirements will governmental agencies impose on manufacturers of NBC/CBR, positive pressure, negative pressure and powered air respiratory equipment?
 - b. Of the service life requirements imposed or recommended, what technology will form the basis for those requirements?
 - c. With the Agent Challenge "Scenario" to be determined, will the primary respiratory challenge chemical warfare agents be limited to GB and HD?
 - d. Will HD still play a role in negative pressure canister and cartridge surface penetration testing parameters?
 - e. How will live or facsimile biological agents be integrated into the Agent Challenge Scenario?
 - f. With the types of respirators being classified into six (6) categories (Escape Hood, APR, PAPR, SAR, Open Circuit SCBA and Closed Circuit SCBA), will there be options for additional respirator categories to be added? (For instance the One Time Use/Disposable Full face Respirator under a category called "Response Respirator (RR)™")
 - g. IDLH and STEL figures, as they exist for chemical warfare agents, are of extreme value. In a civilian emergency response focus, those figures are as important to responders as the NIOSH/OSHA figures are to industrial end users. Are the IDLH/STEL figures for this protocol going to be actual or safe sided in support of the zero acceptable casualty concept?
 - h. With CBR standards for SCBA due to be published by the NIOSH "consortium" in FY 2001, will the CBR standards for all other respirator classes be in yearly increments after that or one bulk publication in the fiscal years of 2002 and 2003?

- i. Of the noted quantity of US military specified “gas masks” in the “field” (the M17A1 and the MCU-2P as two examples), what is the proposed guidance for those end users in the interim until negative pressure protocols are published?
- j. Will technical parameters be integrated into the standards that will allow a version of the projected Joint Services Ground Protective Mask to gain “NIOSH” approval as a “Response Respirator”?
- k. Is it correct in understanding that the Chemical term in the Public Meeting Subject Header covers the Toxic Industrial Chemicals (TIC/TIM) as well as the understood military chemical “warfare” agents?
- l. SCBA standard parameters appear to be fairly straight forward in terms of system and component Live Agent Testing (LAT™) for permeation and swatch testing and APR standard parameters include the SCBA parameters plus challenge concentration, breakthrough point, breakthrough end-point, breathing flow rates, temperature extreme and “human” wear- variables /factors. Will the six respirator categories identified have a common thread that incorporates all of these parameters identified plus end user assessment/feedback integrated into the approval process? Similar to the comment made by Wayne Davis at Natick on NIOSH assessing the current respirator technology available to the civilian end user.

2. Pending your comments.

TKC, 4/12/2001, 3:11pm.