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From: Puckace, Kevin Eugene Mr. SBCCOM [kevin.puckace@us.army.mil]
Sent: Thursday, July 03, 2003 10:56 AM
To: 'NIOCINDOCKET@CDC.GOV'
Subject: Comments for CBRN Escape Respirator Standard

I am a member of the U.S. Army SBCCOM reviewing your CBRN Escape Respirator Standards (draft 15 June 03). Attached are my comments.

<<Comments to NIOSH Escape Standard, 3 Jul 2003.doc>>

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COMMENTS TO CONCEPT FOR CBRN ESCAPE RESPIRATOR STANDARD

SECTION	SUGGESTED CHANGE	RATIONALE
Part 1, Para 3(b) and 4(b)	These paragraphs are confusing. Are the Gas life tests to be conducted at both 100 L/min and 64 L/min? If so, then just state this in 4(b).	Clarification.
Part 1, Para 5	Although environmental conditioning is to be performed in the ready-to-use configuration, the test configuration for vibration and drop tests are not specified. If these tests are also to be performed in the ready-to-use-configuration, state this. Change to, "Environmental, <i>vibration, and drop</i> conditioning will be performed..."	Clarification.
Part 1, Para 5, Durability Test Matrix, Hot Constant, Test Method	Change to, "Mil-Std-810F, 501.4, <i>Procedure I.</i> "	To clarify that this is a "storage" test and not and "operational" test.
Part 1, Para 5, Durability Test Matrix, Cold Constant, Test Method	Change to, "Mil-Std-810F, 502.4, <i>Procedure I.</i> "	To clarify that this is a "storage" test and not and "operational" test.
Part 1, Para 5, Durability Test Matrix, Humidity, Test Method and Duration	Change Test Method cell to, "Mil-Std-810E, 507.3, <i>Procedure II.</i> " Change Duration cell to, " <i>5 Days.</i> "	Consistency. Additionally, is there supporting rationale as to why Mil-Std 810E is used instead of Mil-Std 810F, 507.4?
Part 1, Para 5, Durability Test Matrix, Transportation Vibration, Test Method and Duration	Need to specify Procedure number (probably Procedure II or III).	Clarification.
Part 1, Para 5(a), Test Sequence and Quantity Chart	Add a footer statement similar to footer (1) describing testing for Service Life. For instance, will any Service Life tests be conducted prior to conditioning?	Clarification.
Part 1, Para 6(d), Breathing Gas	The chart lists maximum CO ₂ as 2.0%; however, the following paragraph sets the maximum concentration as 1.5%. Furthermore, the chart does not list the maximum CO ₂ for 30 to 60 minutes.	Clarification.
Part 1, Para 6(h), Flammability and Heat Resistance	I believe that it was mentioned at the last NIOSH Public Meeting that Flammability and Heat Resistance shall be tested for those masks seeking Carbon Monoxide certification (or vice versa). If this is so, then state that these requirements are linked.	Trackability.
Part 1, Para 6(i), LRPL	The NIOSH LRPL Standard for SCBAs states an atmosphere containing 15- 40 mg/m ³ of corn oil aerosol, not 20 - 40 mg/m ³ as is stated in this standard. May want to change to 15 – 40 mg/m ³ for consistency with an already existing NIOSH SOP.	Consistency.
Parts 1 and 2	The optional certification for Communication (Modified Rhyme Test) has been omitted. Is this no longer an option for certification?	Clarification.