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11/21/08

**INTERACTIVE  
SAFETY PRODUCTS, INC.**

9825-A Northcross Center Court  
Huntersville, NC 28078  
Tel: 704-664-7377  
Toll Free: 800-251-7377  
Fax: 704-664-7316

E-mail: [sales@helmetssystem.com](mailto:sales@helmetssystem.com)  
Web Site: [www.helmetssystem.com](http://www.helmetssystem.com)

November 19, 2008

NIOSH Docket Office, Reference: NIOSH DOCKET -008  
Robert A. Taft Laboratories, M/S C34  
4676 Columbia Parkway  
Cincinnati, Ohio 45226

Dear Sir or Madam,

In reference to NIOSH DOCKET -008 pertaining to the Powered Air-Purifying Respirator (PAPR) Standards, Interactive Safety Products requests that consideration be given to the option of obtaining approval for abrasive blasting. We request this for a PAPR constructed to provide against impact and abrasion from rebounding materials to the wearer's head and neck which is the same as described in 42CFR84.139 for type CE supplied-air respirators (SAR).

Interactive Safety Products believes that with the draft PAPR proposal requiring positive pressure in the facepiece and a low battery alarm, users could safely and effectively use a PAPR in abrasive blasting operations and would actually be getting a higher level of protection than that offered with some of the presently approved type CE SARs.

One concern may be assuring that the respirator has a high enough assigned protection factor (APF). In concert with OSHA (Federal Register Notice 71:50121-50192, dated 8/24/2006) Interactive Safety Products would support NIOSH requiring that manufacturers seeking approval for abrasive blasting operations provide test data showing that the PAPR is capable of achieving an APF of at least 1000.

From a user's standpoint, Interactive Safety Products would like to point out that many of our users have asked if our present PAPR (the PureFlo ESM) can be used in abrasive blasting operations since it would not tether them to an airline.

In consideration of the above, Interactive Safety Products suggests the following language for the proposed PAPR standard:

Section 6.6 (or as appropriate) Abrasive blasting approval (optional):

In addition to meeting base requirements, manufacturers may seek approval for a PAPR as suitable for abrasive blasting where the PAPR is constructed to provide against impact and abrasion from rebounding materials to the wearer's head and neck.



Such requests shall include data demonstrating that the PAPR is capable of providing an APF of no less than 1000 as determined by an independent testing organization acceptable to NIOSH.

For further background information, the following NIOSH User Notice is reproduced in part from a 1996 NIOSH User's Notice entitled May 23, 1996 - All Users of Type CE, Abrasive-Blast Supplied-Air Respirators

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### **NIOSH Respirator User Notices**

May 23, 1996

SUBJECT: All Users of Type CE, Abrasive-Blast Supplied-Air Respirators

The National Institute for Occupational Safety and Health (NIOSH) is updating information on (1) the kinds of respirators approved for abrasive-blast (sandblasting) operations and (2) the NIOSH recommendations for selection and use of these respirators. This information replaces the NIOSH Respirator User Notice dated October 4, 1993.

#### **CURRENT CERTIFIED ABRASIVE-BLASTING RESPIRATORS**

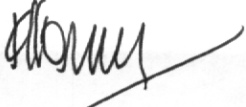
Type CE abrasive-blast supplied-air respirators are the only respirators suitable for use in abrasive-blasting operations.\* Currently, there are four kinds of Type CE abrasive-blast respirators certified by NIOSH. These four kinds of respirators and the NIOSH recommended assigned protection factors † (APF) are:

1. a continuous-flow respirator with a loose-fitting hood and an APF of 25;
2. a continuous-flow respirator with a tight-fitting facepiece and an APF of 50;
3. a positive-pressure respirator with a tight-fitting half-mask facepiece and an APF of 1000;
4. a pressure-demand or positive-pressure respirator containing a tight-fitting full facepiece and an APF of 2000.

\*Note: Air purifying and powered-air purifying respirators are not recommended for abrasive blasting operations, but may be suitable for auxiliary work such as outside clean-up operations.

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Thank you for your consideration into this request

Mr. K. J. Korney   
CEO  
Interactive Safety Products, Inc..

CC: Mr. Jon Szalajda  
Chief, Policy and Standards Development Branch  
National Personal Protective Technology Laboratory  
National Institute for Occupational Safety and Health  
P.O. Box 18070  
626 Cochran Mill Road  
Pittsburgh, PA 15236