

**Miller, Diane M. (CDC/NIOSH/EID)**

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**Sent:** Friday, January 18, 2008 1:40 PM  
**To:** NIOSH Docket Office (CDC)  
**Cc:** David.Spelce@med.navy.mil  
**Subject:** Docket Number 008 - Public Comments

**Reference Docket Number 008**

**To: NIOSH Docket Officer**  
**PUBLIC COMMENTS for Proposed Concept: Powered Air-Purifying Respirator (PAPR) Standard, Subpart P, December 21, 2007**

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Section 2.7, Definitions: The current wording is: "2.7 LCBRN -A loose-fitting PAPR that meets the additional minimum requirements defined herein for LCBRN protection."

Comment

The definition for LCBRN is not clear. Is the intent of "LCBRN" to define a powered air purifying respirator for the CBRN First Receiver community?

Table 5, page 18, LRPL Values:

Comment

It is not clear what is meant by "LRPL-Minimum Value (%)"

The current note in this table states: "Note: The protection offered by a given respirator is contingent upon (1) the user adhering to complete respirator program requirements (2) use in an approved configuration, and (3) individual fit testing. This data may be used in an applicant's request to OSHA for assignment of an assigned protection factor."

Comment

It is not clear what is meant by the statement : "This data may be used in an applicant's request to OSHA for assignment of an assigned protection factor." Can a manufacturer use NIOSH testing data to confirm a helmet or hood PAPR is acceptable for demonstrated performance at a level of 1,000 or greater for a loose fitting helmet/hood facepiece (as required in 29 CFR 1910.134, Table 1)? Once the facepiece demonstrates a protection factor, can the manufacturer use this information for recommending required fit factors during quantitative fit testing these respirators on first responders?

Section 5.2 LCBRN Receiver requirements. "Respirators used for lower level CBRN event:"

Comment

The meaning of "LCBRN Receiver" is not clear. The "Definitions" section of this document should define "LCBRN Receiver."

Section 5.2.1, "All respirators (Respirators used for lower level CBRN event) must obtain LRPL value of  $\geq 10,000$  for  $> 95\%$  of the trials with the blower operating. This exceeds the general requirement for a loose-fitting PAPR."

Comment

It is not clear what is meant by the statement: "This exceeds the general requirements for a loose-fitting PAPR."