

**Dragon, Karen E. (CDC/NIOSH/EIDIV)**

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**From:** Dmitri [dima\_k@optushome.com.au]  
**Sent:** Monday, October 09, 2006 8:22 PM  
**To:** NIOSH Docket Office (CDC)  
**Subject:** CBRN standard recommendations from SEA, based on NIOSH CBRN PAPR spec 21 Aug 2006  
**Attachments:** Analysis of NIOSH CBRN PAPR spec draft 21 Aug 06 1.2.doc

Dear Sirs

The S.E.A. team would like to present the attached document (MS Word versions) for your attention.  
We believe it may help you further in the PAPR standard development.

Thank you.

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***Analysis of NIOSH CBRN PAPR spec August 21, 2006***

This standard requires a section providing guidance to users of the level of work that may be undertaken with these CBRN-PAPRs and the possibility of out breathing them and other limitations.

**1.0 Durability conditioning**

Durability conditioning applies only to tight-fitting facepieces. Use restrictions should therefore apply to loose-fitting PAPRs to reflect this.

**3.0 LRPL**

Tight-fitting PAPRs are required to meet LRPL 2,000 in Blower Off mode. Use restrictions should therefore apply to tight-fitting PAPRs when used in Blower Off mode.

**4.0 Gas Capacity**

Loose-fitting PAPRs are tested with gas challenges half that of tight fitting facepieces. Use restrictions should therefore apply to loose-fitting PAPRs to reflect this.

**5.0 Upgrade Retrofit**

Clause 5.2 states that retrofit be done in accordance with manufacturer instructions applies only to tight-fitting PAPRs. Should this not apply also to loose-fitting PAPRs?

Clause 5.7 states that, in performing LAT, NIOSH may perform "...any other tests... as deemed necessary by NIOSH." Manufacturers cannot be expected to develop products to meet unknown tests.

NIOSH should confirm that retrofit approval is not required where existing 42 CFR-approved PAPRs gain CBRN approval. This should also be the case if existing 42 CFR approved PAPER gain CBRN approval with alternative required components.