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NIOSH Docket 139 16 Jul Final....

Reference: NIOSH Docket number 139

To: NIOSH Docket Officer

PUBLIC COMMENTS for: The Potential Modification of the NIOSH Statement of Standard for a Chemical, Biological, Radiological, and Nuclear (CBRN) Full Facepiece Air-Purifying Respirator (APR), 18 Jun 2008

My comments are provided in the attached file for your consideration.

David

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COMMENTS ON
NIOSH Docket Number 139
The Potential Modification of the NIOSH Statement of Standard for a Chemical, Biological, Radiological, and Nuclear (CBRN) Full Facepiece Air-Purifying Respirator (APR)

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Ref: (a) NIOSH Statement of Standard for Chemical, Biological, Radiological, and Nuclear (CBRN) Full Facepiece Air Purifying Respirator (APR) updated 30 Jan 2004
(b) U.S. Department of Defense Joint Requirements Oversight Council, "Capability Production Document for the Joint Services General Purpose Mask (JSGPM)," 04 October 2005

This document provides rationale in support of modifying the CBRN APR Statement of Standard (reference (a)) to allow the bayonet mounted canisters of the Joint Services General Purpose Mask (JSGPM) as an alternative approved design for Department of Navy applications.

Background:

The JSGPM is the next generation of military gas mask and was developed as a joint effort by all branches of the Armed Services. One of the key objectives at the inception of the JSGPM program was development of a mask that would attain NIOSH approval. The JSGPM had been in development five years before promulgation of CBRN APR Statement of Standard in March of 2003. However, due to the bayonet design of the canisters, the possibility of NIOSH approval for the JSGPM was unattainable because the CBRN APR Statement of Standard allowed only gas masks with 40 mm NATO threaded canisters to be candidates for CBRN respirator approval.

Discussion:

Military gas mask design evolved into the innovative JSGPM, which greatly improves warfighter protection, is compatible with modern weapon systems and will replace all existing military gas masks. For example, the existing mask design with 40 mm NATO threaded canisters, now required by NIOSH to pass CBRN certification, is not compatible with evolving warfighting capability needs. The JSGPM has incorporated the dual bayonet mounted canisters to provide enhanced protection against CBRN agents and toxic industrial chemicals. It also boasts other improvements over current military respirators, including a lower breathing resistance, reduced weight and bulk, visor ballistics protection, improved field of view, greater comfort and compatible use with existing airfield, shipboard, and battlefield equipment. The JSGPM dual bayonet mounted canister design further decreases and balances the weight of the mask and provides the warfighter with the ability to change out cartridges on a contaminated battlefield - a task that cannot be accomplished with NIOSH CBRN approved respirators with 40 mm NATO threaded canisters.

Except for its bayonet mount canister configuration, the JSGPM will pass all NIOSH CBRN testing criteria, including breathing resistance requirements. The JSGPM CBRN canister passed NIOSH Capacity 1 CBRN testing on 6 March 2006.

Modifying the CBRN APR Statement of Standard to allow the JSGPM bayonet mounted canisters has far reaching positive impacts for the Navy. There are two distinct Navy populations that will wear the JSGPM: military warfighters and Navy installation CBRN first responders. It is noteworthy that the Department of Defense (DOD) has chosen to include the requirement for NIOSH approval of the JSGPM in military doctrine (reference (b)), even though military-unique operations are exempt from compliance with Occupational Safety and Health Administration (OSHA) regulations. In contrast, the Navy's CBRN first responders, including civilian, military, and contract personnel, must comply with OSHA regulations - and thus can wear *only* NIOSH approved respirators. Although the JSGPM was primarily developed for CBRN defense during combat, it was also intended to be worn by Navy civilians working side-by-side with their military counterparts during times of non-warfare CBRN emergencies.

During emergency response situations, interoperability within the Navy and across the other DOD component services will be critical. One of the first actions that will occur on Navy installations under terrorist attack will be to increase security by halting admittance to the base. The biggest support contingent, and possibly the only assistance Navy installations will receive in the aftermath of a CBRN incident, will be from outside military warfighting units deployed to assist defense installations.

Canister interchangeability with state and local response resources should not be the primary consideration for responders protecting military assets. The Navy operates an independent military supply system that supports issue and replacement of canisters for the JSGPM and thus will be self-sufficient. Using a single gas mask for Navy installation first responders and for military warfighters is essential to establish canister interoperability within the Navy. Gaining approval for the JSGPM will allow the 48,000 Navy installation CBRN first responders to use this mask during consequence management and installation protection and ensure mask interoperability with the military units deployed to assist the installation.