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NIOSH Docket Office
Attn. Robert A. Taft
Laboratories, M/S C34,
4676 Columbia
Parkway, Cincinnati, Ohio 45226
USA

July 19, 1996

Reference: Schmon/is

Telefon -214

Dear Mister Taft,

We are sorry that we have not been able to participate in the public meetings on 42 CFR Part 84 since we only received the information from the Federal Register, dated May 16, 1996, Volume 61, Number 96, at the beginning of July 1996. However, we would like to take the opportunity of commenting on the circular:

In the case of continous flow supplied air respirators it is not permitted in the U.S. to operate an additional compressed air device which is directly based on the belt unit. This regulation insures that the user will in any case be supplied with the specified minimum air flow volume. An additional compressed air device could use too much air so that the air volume necessary for the user would not suffice.

The discussion about the details of the new Eurpean Norm DIN EN 270 was also covering the question of how to avoid dangerous situations for the user by any means. The only solution possible is to additionally supply air respirators with the following safety equipment:

1. Air flow volume measuring device
2. Minimum air flow warning device

R E C E I V E D

JUL 26 1996

NIOSH DOCKET OFFICE

Commerzbank Ludwigsburg (BLZ 604 400 73) Kto. 7322 001
Dresdner Bank AG Ludwigsburg (BLZ 604 800 08) Kto. 5 024 821
Volksbank Ludwigsburg EG (BLZ 604 901 50) Kto. 480 832 005
Postgirokonto Stuttgart (BLZ 600 100 70) Kto. 4997-708
Kreissparkasse Ludwigsburg (BLZ 604 500 50) Kto. 25669
Baden-Württembergische Bank Ludwigsburg (BLZ 604 300 60) Kto. 83 235 44000

Kommanditgesellschaft mit Sitz in Kornwestheim
Registergericht Ludwigsburg HRA 2151
Persönlich haftende Gesellschafterin: SATA Verwaltungs-GmbH
mit Sitz in Kornwestheim, HRB 2857
Geschäftsführer: Dipl.-Kfm. Manfred Liphardt, Steinheim/Murr

Concerning 1:

The Air flow volume measuring device which is installed in the air respirator indicates by means of a manometer e.g. how much air is fed into the breathing mask. The user can then check the volume very easily due to a red/green indication scale. This measuring device allows the user in any possible state of operation to control the air feed, and to make sure that the air hoses are not deformed, squeezed or congested. This device ensures an additional protection for the user.

Concerning 2

The minimum air flow warning device indicates by means of an acoustic signal or a display in the immediate field of vision that the air flow is falling short of its minimum. The user can then immediately take the necessary measures. The additional protection compared with the former version approved by NIOSH consists in the fact that the failure or the decrease in the air feed and also the rupture or squeeze of an air hose or tube will show immediately, and in a way the user can perceive. A negative contamination of the respirable air is excluded if the air for the compressed air device is branched from the activated charcoal and particle filter fixed to the belt unit. In this case the air fed into the mask is always cleaned to a maximum extent.

As this version provides an improvement of the user protection, and as the air respirator and the compressed air device are much more user-friendly due to its extended application range, we hold that these specifications should be considered for the review of the 42 CFR Part 84. We would be very happy to supply you a sample device, the complete documentation, or the English version of the European Norm.

Our below mentioned review refers to the following issues:

Issue 2

NIOSH should accept the ISO 9000ff standards so that companies certified according to ISO 9000ff do not have to undergo additional audits which would only result in additional costs.

Issue 3

NIOSH should also, like other air respirator audit institutions throughout the world, charge the totale costs for any audit.

Issue 4

An inspection of spare parts produced by a third party cannot and must not be conducted. This measure would put health protection as a whole into question since it is only the producer who knows the important details of the parts. Moreover, NIOSH would in this way instigate companies to infringe Copyrights, which cannot be in the interest of NIOSH.

Issue 5

A product audit may not be charged to the producer. An audit sample could be supplied by the producer as a service free of charge. A one to two years period of time between audits should be sufficient. A product audit makes a system audit unnecessary, and it can, therefore, be dropped.

Issue 6

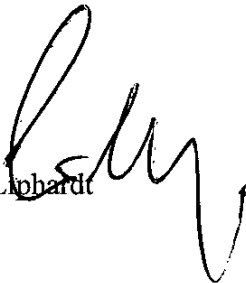
A list of all certifications available is very useful for the purchaser or user. If this list is updated every year the user may know which devices are still certified and which are not.

It is inappropriate to impose a time limit on the certifications since the certification costs would increase the price of the product and would obstruct its sale. There are cases in Europe where suppliers have made this negative experience.

We would be very pleased if our propositions were considered for the review of 42 CFR Part 84. Should you have any questions please do not hesitate to contact the undersigned Dr. Schmon. We kindly ask you to timely send us information on the time schedule of further reviews.

Very truly yours

SATA-Farbspritztechnik GmbH & Co.


Lohardt


i.V. Dr. Schmon