

July 8, 2003

NIOSH Docket Officer
Robert Taft Laboratories, M/S C34
4676 Columbia Parkway
Cincinnati, OH 45226

RE: CBRN Escape Respirator Standard Development Effort

Docket Officer:

Please find the following comments related to NIOSH's development of a standard for CBRN Escape Respirators below. These comments are based upon review of the June 30, 2003 draft titled "Concept for CBRN Escape Respirator Standard."

Section 2 (b) and Section 2(d): All breakthrough concentrations for the chemical challenges appear to be related to ERPG values with one exception, ammonia. The breakthrough value of 12.5 ppm does not seem to be anywhere near the values of 150ppm for ERPG 2 or 750 ppm for ERPG 3. A review of NIOSH values for PEL (25 ppm), STEL (35 ppm) or IDLH (300 ppm) does not indicate the reason for choosing 12.5 ppm as a breakthrough value. Should NIOSH be somewhat concerned that the ERPG values and the IDLH are somewhat in conflict, then I suggest NIOSH chose a breakthrough concentration (keeping in mind that this is a one-time escape device of no longer than 60 minutes) that matches either the OSHA PEL of 50 ppm or perhaps even the STEL of 35 ppm. By using one of these values NIOSH maintains some clear reasoning behind each of the breakthroughs.

Please contact me if you have any questions.

Sincerely yours,

Richard Stein, Ph.D.