

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

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**From:** Sell, Robert [Robert.Sell@draeger.com]  
**Sent:** Friday, January 16, 2009 9:10 AM  
**To:** NIOSH Docket Office (CDC)  
**Cc:** Szalajda, Jonathan V. (CDC/NIOSH/NPPTL); Rueck, Klaus-Michael; Drews, Wolfgang; Bahr, Axel; Ammann, Klaus; Hodson, David; Heye, Jens  
**Subject:** 008-A - Powered Air-Purifying Respirator (PAPR) Discussion Topics  
**Attachments:** Draeger PAPR Comments - NIOSH Docket No 008-A - Jan 2009.doc

Hello:

Attached please find Draeger Safety's comments for NIOSH Docket No. 008-A for the PAPR Concept that was discussed during the December 2008 Public Meeting.

If there should be any questions, please do not hesitate to contact me.

Regards

Bob Sell

Sr. Project Engineer - Protection

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January 14, 2009

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Reference: DOCKET NUMBER NIOSH 008-A  
Concept Paper: Proposed Industrial Powered, Air- Purifying Respirator  
(PAPR) Standard – December 2, 2008 NIOSH Public Meeting

Dear Sir / Madam:

Draeger Safety manufactures respirators for various markets and applications therefore we offer the following comments in response to the NIOSH Concept Paper: Proposed Industrial Powered, Air- Purifying Respirator (PAPR) Standard which was discussed at the December 2008 Public Meeting hosted by NPPTL.

The following Draeger Safety comments are being submitted for consideration and we will comment step-by-step through the draft protocol:

### **General Comment:**

It was announced at the Public Meeting in December 2008 that NPPTL was not intending to publish a final concept document for review. Draeger Safety would like to reiterate our comment that was submitted to the Docket 008-A on December 5, 2008 which requested that this be reconsidered and that another (final) release of the concept be issued for a thorough review. Many comments were submitted by Draeger Safety and by others to the previous concept and to date no information has been provided concerning the comments that were provided and how these may have impacted the concept. In addition, the Docket period for receipt of comments on the PAPR Docket 008-A should be extended until this concept has been released.

### **Opinions on the concept of categorizing PAPRs as breath assisted or positive pressure devices:**

Draeger Safety is supporting this proposed categorization for PAPR classifications.

### **Opinions on the expansion of the number of work rates where PAPRs can be submitted for approval:**

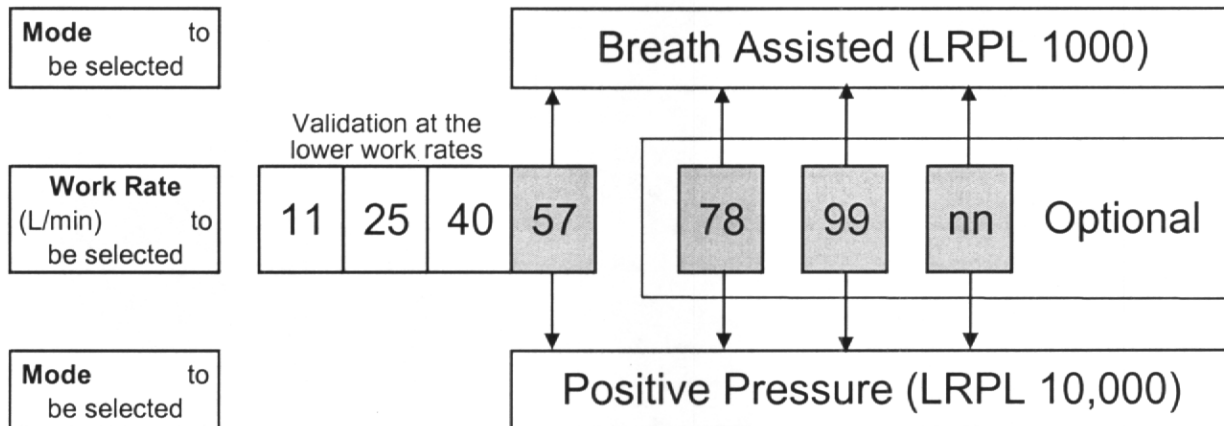
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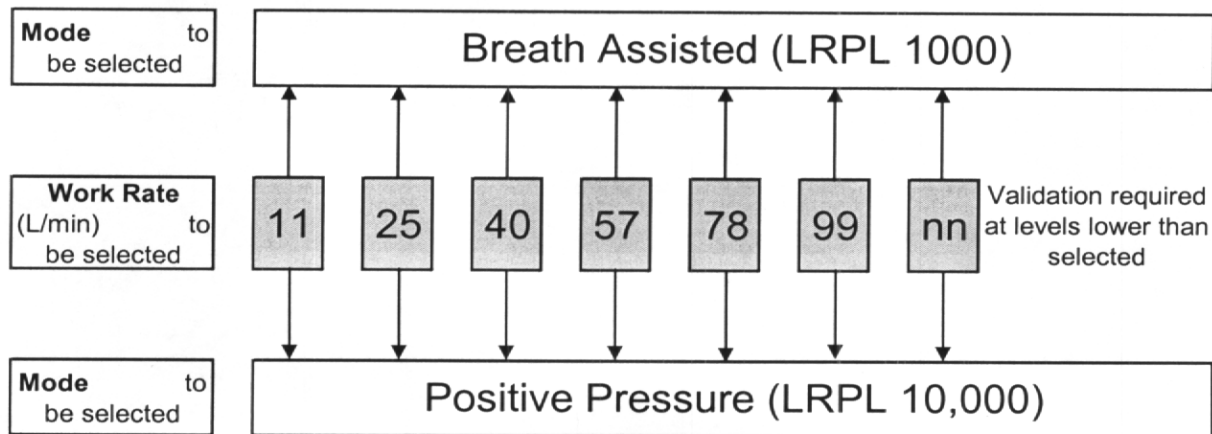
Draeger Safety, in general, supports this concept and we would propose to further distinguish between loose fitting and tight fitting respiratory inlet requirements for breath assisted and positive pressure devices. In addition, we also propose that for loose fitting units that a minimum work rate of 57 Lpm be established. This is proposed in order to prevent users of loose fitting systems from over breathing the breath assisted devices. For example, if a loose fitting system for work rates up to 11 Lpm (approximately 35 Lpm constant flows) is in use there will be certain instances where the user will perform activities at higher work rates than the device was designated for and would be subjected to the respiratory hazards. As soon as the work rates exceed 11 Lpm then the system will not provide the LRPL protection of 250 and situations of this nature can not be remedied through the user instructions or safety warnings.

Finally, Draeger also proposes that higher work rates be considered as an option if it has been requested by the applicant and this is indicated by the boxes "nn" in the concepts below. This same approach is proposed for tight fitting units and all of the work rates can be used since the LRPL values are not related only to the PAPR performance.

### PAPR work rates mode concept for loose fitting devices:



PAPR work rates mode concept for tight fitting devices:



## Opinions on the linkage of breath assisted PAPRs and positive pressure PAPRs with LRPL testing:

Draeger Safety supports LRPL testing with the values proposed above with our concepts for work rates when the respirator is evaluated in the operational mode. We are not sure if this request for information is also considering increasing the activities performed for the LRPL in order to evaluate the higher work rates and clarification is requested on this.

## Opinions on the consideration of an alternate approach to gas and vapor testing:

Draeger Safety supports the use of the Wheeler Relationship for assessing the effect of flow. We also support the use of Cyclohexane for organic vapor testing, the discontinuation of the pre-conditioning requirements, the allowance for multiple gas type approvals where the minimum required test times are halved, and the testing of the as-received samples at 25% RH and 85% RH.

## Opinions on the establishment of positive pressure PAPR ESLI for organic vapors and acid gases:

Draeger Safety does not believe that the technology being developed has been fully developed enough to make this a mandatory requirement at this time. We would advocate allowing the ESLI to be an option and certification protocols should be developed in order to evaluate ESLI if they are requested to be certified by an applicant.

# Dräger safety

Draeger Safety thanks NIOSH for the opportunity to provide comments. Please consider our comments concerning the ongoing changes to the standard.

If there should be any questions concerning this matter, please do not hesitate to contact me at 412-788-5685 or via e-mail at [Robert.Sell@Draeger.com](mailto:Robert.Sell@Draeger.com).

Respectfully,

*Robert Sell*

Robert Sell  
Sr. Project Engineer

cc: W. Drews – DST  
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