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TO: Safety Directors

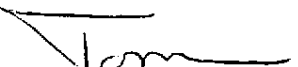
FROM: Tom Grumbles
DATE: December 7, 1984

Interoffice
Communication

SUBJ: NIOSH NOTICES

VISTA

Enclosed are two recent NIOSH notices dealing with respiratory protection equipment. Please pay particular attention to the notice regarding unapproved assemblies. Through recent activities and discussions with Jerry Halford (consultant who spoke to us at the IH meeting) we know OSHA has respiratory protection programs high on their "hit" list. It would be a good time to review current programs to assure compliance with the regs as well as plant policies.


Thomas G. Grumbles

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Centers for Disease Control
National Institute for Occupational
Safety and Health - ALOSH
944 Chestnut Ridge Road
Morgantown, WV 26505-2888

November 6, 1984

RESPIRATOR USERS' NOTICE

USE OF UNAPPROVED SUBASSEMBLIES

The National Institute for Occupational Safety and Health (NIOSH) has received many questions and complaints in regard to interchangeability of respirator subassemblies and unapproved modifications to MSHA/NIOSH certified respirators. Further, some problems reported to NIOSH have, upon investigation, been found to have been caused by user's modifying certified respirators which have resulted in the modified respirator failing to perform as anticipated, thus jeopardizing the respirator user.

MSHA/NIOSH respirator certification regulations, Title 30 Code of Federal Regulations Part 11 (30 CFR 11), state that approved respirators are ones that "are maintained in an approved condition and are the same in all respects as those respirators for which a certificate has been issued." [30 CFR 11, 11.2(b)] In addition, the regulations permit NIOSH/MSHA to only approve complete respirator assemblies and prohibit the approval of respirator subassemblies such as cylinders or air supply hoses. These requirements are intended to insure that one manufacturer has overall control and responsibility for the integrity of the approved respirator.

In some cases even minor modifications to respirators may make significant changes in the performance of the respirator. Manufacturers who modify certified respirators must test the modification to determine if the respirator continues to meet the minimum requirements of 30 CFR 11, and must submit the modifications to NIOSH. A user who modifies a certified respirator may not be able to determine whether a change will decrease respiratory protection. Several cases have been reported to NIOSH where unapproved modifications or use of an unapproved subassembly have resulted in respirator failures. Therefore, users of NIOSH/MSHA approved respirators are cautioned against interchanging subassemblies or making unapproved modifications to their respiratory protective devices.

John B. Moran
Director

Division of Safety Research