

NFPA 1982® - 2013

Standard on Personal Alert Safety Systems (PASS)

TIA Log No. 1112

Reference: 4.1.8 and 4.1.9

Comment Closing Date: August 12, 2013

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1. Revise 4.1.8 and 4.1.9 to read as follows:

4.1.8 The certification organization shall not permit any manufacturer to label any PASS as compliant with the 2007 edition of this standard on or after ~~August 31, 2013~~ February 28, 2014.

4.1.9 The certification organization shall require manufacturers to remove all certification labels and product labels indicating compliance with the 2007 edition of this standard from all PASS that are under the control of the manufacturer on ~~August 31, 2013~~ February 28, 2014. The certification organization shall verify this action is taken.

Submitter's Substantiation: This TIA is related to a similar TIA being submitted to NFPA 1981. The testing and certification of an integrated PASS device is directly related to the testing and certification of the SCBA. The submitters emphasize the importance of the two documents continuing to have the same compliance dates.

The purpose of this TIA is to update on the National Institute for Occupational Safety and Health (NIOSH) testing of CBRN SCBAs. Some unanticipated delays have the potential to negatively impact the timeliness of completion of NIOSH SCBA approvals. These delays could in turn impact approvals and certification of SCBAs by the relevant certification organization (SEI) to the NFPA 1981 standard, 2013 edition. That standard states in paragraph 4.1.11 that "The certification organizations shall not permit any manufacturer to label any SCBA as compliant with the 2007 edition of this standard on or after 31 August 2013, except when replacement labels or replacement components that bear the certification organization's label are required." The presumption in the Technical Committee choosing this date was that it would provide sufficient time for manufacturers' new designs to have successfully completed the evaluations for the certification authorities to be able to issue certifications for compliance to the NIOSH and NFPA standards by that date.

Emergency Nature: NIOSH testing to the Statement of Standard for Self Contained Breathing Apparatus (SCBA) with Chemical, Biological, Radiological, and Nuclear (CBRN) Protection used to Protect Emergency Responders Against CBRN Agents in Terrorist Attacks in conjunction with the National Fire Protection Association (NFPA) Standard 1981 for Open-Circuit Self-Contained Breathing Apparatus for Fire Fighters contain three interlocked activities. One is NIOSH certification under 42 CFR Part 84, Subpart H; two is compliance with National Fire Protection Association (NFPA) Standard 1981 for Open-Circuit Self-Contained Breathing Apparatus for Fire Fighters, current edition; and three is special tests under NIOSH 42 CFR 84.63(c): Chemical Agent Permeation and Penetration Resistance Against Distilled Sulfur Mustard (HD) and Sarin (GB), performed by The US Army Edgewood Chemical Biological Center (ECBC) Testing Center and Laboratory Respirator Protection Level (LRPL), performed by NPPTL. To minimize the total time for CBRN approvals, NIOSH and SEI have a simultaneous test and approval protocol.

The National Personal Protective Technology Laboratory (NPPTL) has allocated its resources provide for the completion of all 9 internally-conducted tests, evaluations and issuance of approvals for SCBA manufacturer applications submitted prior to 1 June 2013 by September 1st. SEI has also allocated resources to provide for completion of the NFPA 1981 compliance testing for apparatus received by the same date.

However, the availability of ECBC testing resources to complete the HD and GB testing has been negatively impacted by the Federal Government Budget Sequestration. Consequently, delays are anticipated. Representatives from NPPTL and ECBC are working closely to develop a projected testing schedule.

A delay past the August 31st date poses a significant impact on fire departments or first responder organizations that planned 4th quarter of 2013 purchases or need an emergency purchase of compliant SCBA with integrated PASS. These organizations may not have access to the manufacturer of their current inventory SCBA, posing the dilemma of purchasing another manufacturers product or foregoing purchase until compliant product is available. Either of these approaches will impact firefighter safety, by requiring additional training and creating a mixed inventory of SCBA with compromised interoperability of SCBA units. Departments may be faced with either an inadequate number of compliant SCBAs for operations or sending responders into a hazardous situation with safety equipment that is no longer compliant with NFPA 1981. Additionally, there is concern that without this compliance date extension, products compliant to the 2007 edition of NFPA 1981 will no longer be available after August 31, 2013.

Anyone may submit a comment by the closing date indicated above. To submit a comment, please identify the number of the TIA and forward to the [Secretary, Standards Council](#), 1 Batterymarch Park, Quincy, MA 02169-7471.