



7/01/2020

**RE: Battelle Response to Cal/OSHA Guidance on Mask Labeling**

Prior to the COVID-19 pandemic, marking N95 respirators with a permanent marker voided the NIOSH certification for masks. In March, it was evident that the severe shortage of N95 respirator masks in the US supply chain posed a great health threat to front-line workers. The FDA approved CCDS decontamination technology, instructions and operating procedures through the Emergency Use Authorization (EUA). The CCDS instructions include labeling N95 masks with permanent marker during this emergency pandemic situation.

Recently, [NIOSH](#) and [3M](#) completed independent studies of the CCDS decontamination process which included N95 respirator masks labeled with Sharpie permanent marker. Both studies deemed the CCDS process to pass their evaluations, finding no degradation of filter performance or fit through 20 decontamination cycles.

Additionally, Battelle researchers completed a study to assess the potential impact on N95 filtration performance from marking with a Sharpie permanent marker. As expected, there were no adverse impacts to filtration performance through 20 cycles.

Battelle must adhere to the FDA EUA and cannot process masks that are not in compliance with the approved marking instructions. Healthcare workers should continue to write their 3-digit site code (and an optional 2-digit ID) onto each N95 using a permanent marker. Battelle CCDS sites will continue to mark N95s, using permanent marker, with the number of decontamination cycles each N95 masks undergoes.

Any questions can be directed to:

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