

Dragon, Karen E. (CDC/NIOSH/EID)

From: jmswift@redmond.gov
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To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 221 - NIOSH Regulatory Agenda for updating 42 CFR Part 84 Comments

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Comments

My department is currently in the process of purchasing new SCBA using a FEMA Assistance To Firefighters Grant. While evaluating the different manufacturers, I have noticed they all use the same cylinder manufacturers. But the pricing for the different companies is different. I have inquired if I can purchase cylinders separate from the pack but have been told there is no warranty for the system if cylinders are purchased separately. This makes no sense to me if the SCBA manufacturers

utilize the same cylinder manufacturer. Why is the pack only certifiable if you purchase the cylinder with the pack? It would seem if the cylinder is manufactured separate from the pack assembly and all manufacturers use the same cylinders they should be able to be purchased as separate components and be certified on their own. This would lower costs for end users and allow the end user to choose which cylinder manufacturer they use. Manufacturers should also be required to use interchangeable cylinders so in the event of a large fire with multiple agencies on location they can share cylinders that have the same pressure and time rating. My last comment on cylinders is for the safety of firefighters; all cylinders should be rated at 45 minutes with the intension that they would not work longer but have a larger safety margin during interior fire fighting.

My second concern is the lack of automatically activated tracking devices on packs. In the skiing industry they have PEEPs to aid in the location of lost skiers, but in the fire departments we have firefighters go lost every day but have no means of tracking the position of the individual firefighters. This would seem to me to be one, if not the greatest advances that could be added to the safety and survival of firefighters.

On the note of automatically operating safety devices I would like to see the motion sensing devices be less sensitive. It seems to me with the bells and whistles going off continuously while personnel are working and are safe they are being desensitized to the alert.

I am one of the technicians for our department and do flow testing on SCBA during repair and annual maintenance. It has occurred to me that the limitation of the low air alarm being set at 25% does not allow us to have it activate at higher residual pressure so our personnel avoid running low on air while still in the IDLH atmosphere. I believe this should be adjustable to higher pressures as long as they ring before the 25% point. This would allow our department to have alarms sound at 33% giving our personnel an earlier warning to exit the structure. Our department currently wants personnel out of the structure

with 50% of their air remaining in the cylinder; a higher warning pressure would reinforce this desire.

Thank you for the opportunity to make my comments heard.