

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

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To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 147 - Reevaluation of the NIOSH policy on emergency escape support breathing system or buddy-breather device used with open-circuit self-contained breathing apparatus Comments

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Comments
For the following reasons, I encourage NIOSH to eliminate the prohibition on buddy breathing and allow the use of buddy breathing/EBSS.

- Â· The majority of SCBA's sold in the U.S. include this unregulated device.
- Â· The present technology eliminates the possibility of IDLH exposure.
- Â· There have been no reported failures or fatalities caused by the use of an EBSS.
- Â· There have been documented successes of EBSS being used to remove firefighters from an IDLH environment.
- Â· The NFPA survey that received 1,962 responses indicates that firefighters overwhelmingly want an EBSS available as an option.
- Â· Federal OSHA and OSHA in most states indicate that the use of buddy breathing is encouraged even at the expense of voiding NIOSH certification.
- Â· NFPA has drafted language to include in 1981 Standard for testing of an EBSS.
- Â· Members of NFPA 1404 and 1500 have indicated that they agree with the proposed inclusion of EBSS in 1981 and the elimination of the NIOSH prohibition.
- Â· IAFF has lent its support for firefighter safety to include EBSS as an available option on SCBA's.