

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

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**From:** John Dane [jdane@csfa.net]  
**Sent:** Monday, January 31, 2011 8:04 PM  
**To:** NIOSH Docket Office (CDC)  
**Cc:** anaya@prodigy.net; 'Kevin Nida'  
**Subject:** 147- Reevaluation of NIOSH Policy on Emergency Escape Breathing System/Buddy Breather Device Used With Open Circuit Self-Contained Breathing Apparatus  
**Attachments:** Nida NIOSH letter 1 31 11.doc

January 31, 2011

Letter for the docket attached.

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# California State Firefighters' Association, Inc.

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*"CSFA: A Strong and United Voice."*

Organized: November 10, 1922

January 29, 2011

NIOSH Mailstop: C-34  
Robert A. Taft Lab  
4676 Columbia Parkway  
Cincinnati, OH 45226

Dear Sirs and Madams,

The California State Firefighters' Association (CSFA), the oldest and largest firefighter association in the State of California, representing over 24,000 firefighters and EMS personnel, endorses and supports NIOSH's move to establish a formal position that will finally allow the testing and certification of Self-Contained Breathing Apparatus ("SCBA") with "Emergency Escape Support Breathing Systems," or "buddy breathing devices" (AKA "Emergency Breathing Safety System," or "EBSS").

California statute has allowed SCBAs to be equipped with buddy-breathing devices for more than 25 years (California Code of Regulations, Title 8, 3409(b)(5)). As a result, a majority of California firefighters train with and are prepared to use, buddy-breathing devices in emergency situations. CSFA agrees with the State of California—that buddy-breathing devices provide a means for firefighters to save the lives of other firefighters.

Unlike SCBA equipment of the past, today's SCBAs include matching male/female quick connect/disconnect couplings and short umbilical hoses which allow firefighters to buddy breath without either firefighter removing his or her mask. Specifically, today's technology allows firefighters to share air without being exposed to IDLH atmospheres.

Since firefighters routinely work in dense, smoke-filled environments with little to no visibility, firefighters are faced with the potential to become lost or disoriented inside burning structures. Moreover, because of the inherent danger of firefighting, firefighters also run the risk of becoming trapped or injured inside burning structures. If any of those examples were to occur, buddy-breathing devices provide a means of helping or receiving temporary help to/from others, should a firefighter's air supply run low while awaiting a rescue team, or "Rapid Intervention Team" ("RIT"). A RIT is a pre-assigned group of dedicated and specially trained firefighters on standby, ready to rescue a fellow firefighter should an emergency occur.

For these reasons and many others, CSFA requests NIOSH to move as expeditiously as possible to change its policy to a new document that reflects NIOSH's support of buddy breathing devices and their use.

Thank you for considering this important request.

Respectfully,

Kevin Nida, President  
California State Firefighters' Association