



GOVERNMENT OF THE DISTRICT OF COLUMBIA  
D.C. FIRE AND EMERGENCY MEDICAL SERVICES DEPARTMENT  
WASHINGTON, D.C. 20001



ADDRESS REPLY TO  
"FIRE CHIEF"

December 22, 2010

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

To Whom It May Concern:

The District of Columbia Fire & EMS Department strongly supports the reevaluation of the NIOSH policy on emergency escape support breathing systems (EEBSS). Improvements to respiratory protection technology along with extended service life options for air supply have rendered the present policy obsolete, and NIOSH should develop performance and certification standards for EEBSS so that users may specify equipment that meets their specific needs.

We recommend that NIOSH should evaluate present SCBA technology to enhance responder safety, and that particular attention should be made to maximize ease of EEBSS operation, minimize entanglement hazards, and ensure interoperability between different manufactures.

At a minimum, EEBSS should be able to support two users, each breathing at a rate of 103 liters per minute without damage to the breathing apparatus.

EEBSS technology is not without its drawbacks, and NIOSH should instruct the responsible NFPA committees to address the issues of reduced service life, entanglement, training, and Go/No Go scenarios where the use of EEBSS would endanger both responders. NIOSH should require that 1200 liter (30 Minute) cylinder should not be used with SCBA configured with EEBSS.

Thank you for your time and attention to this matter. Please feel free to contact me at (202) 673-3320 if you have any questions.

Sincerely,

*Dennis L. Rubin*  
Dennis L. Rubin  
Fire and EMS Chief