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Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR); Doyle, Glenn (CDC/NIOSH/EID)
Subject: 123 - breath apparatus Comments

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Comments

I am in favor of rescinding the prohibition against "using a respirator which uses a breathing gas of pure oxygen during direct exposure to open flames and/or high radiant heat" and instead including sufficient performance test requirements, such as a flame engulfment test as described in the 25 January 2008 Federal Register notice. I believe safe operation of the breathing apparatus can be verified through testing and that such a design restrictive require as exists now is unnecessary.

Additionally, I note that the Navy has used the Mine Safety Appliances Type A-4 OBA (aka CHEMOX) breathing apparatus for decades for shipboard firefighting, and still uses it today on some ships. While not a positive pressure device, the OBA does over-produce oxygen and the excess continually vents during use from the relief valve located on the exposed breathing bag. I am unaware of any safety incident with the OBA such as the current prohibition is intended to prevent.