

S.A.F.E.R.

SOUTHERN AREA FIRE EQUIPMENT RESEARCH AND DEVELOPMENT  
2249 Argonne Avenue  
Long Beach, CA 90815

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November 22, 1977

Mr. Robert H. Shutz, Chief  
Testing and Certification Branch  
Division of Safety Research, NIOSH  
944 Chestnut Ridge Road  
Morgantown, W. VA 26505

Dear Mr. Shutz:

In response to your request for comments and input for use during the public meeting to be held on November 29 through December 1, 1977, as they relate to the existing provisions of 30 C.F.R., Part II, the following information and comments are respectfully submitted in hopes that improved performance requirements and the necessary revisions to 30 C.F.R., Part II, will take place.

*not attached*  
Attached is a copy of a petition by this organization (SAFER) to California Division of Industrial Safety for certain exceptions to 30 C.F.R., Part II. You might have a copy of this document in your files as forwarded by U.S. Department of Labor (OSHA) by John A Proctor, Deputy Director. It is my understanding that a similar petition by the California Fire Chiefs Association was directed to your office on or about June 15, 1977.

Additional comments concerning specific items already addressed in the petition are as follows:

1. The manufacturers should be allowed or directed to incorporate into the design of their regulators an auxiliary coupler to allow for uninterrupted "buddy breathing."
  - a. The "time rating" of a unit is of little concern to the firefighter in a precarious situation, especially when he has the training and expertise to safely make his way to breathable air via the "buddy system."
2. Interchangeability of air supply cylinders with related regulators should be allowed without question.
  - a. The threaded connectors are standardized air threads.
  - b. The cylinders themselves are in most cases of the same dimensions and when not, can be accommodated through the use of an adjustable cylinder clamp on the harness.

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3. Facepiece interchangeability should be allowed and looked upon as a safety feature.
  - a. More types of facial features can be accommodated precluding the possibility of face-piece slippage and potential leaks when working in toxic atmospheres.
4. Should the question arise concerning product liability when approved component parts of R.P.D.'s are interchanged with like types, I make the following suggestion: After a determination of the specific component part found to be faulty, liability could be directed to the manufacturer of that specific component part.

In essence, we are addressing the permissive use of constructed component parts of assemblies that are compatible with each other; face pieces with regulators/cylinders with regulators, of like types. We are not suggesting in any way that the internal mechanism of any of these components be interchanged with one another.

Note: The SAFER Association is an organization consisting of research and development personnel from 54 municipality fire departments and 3 large manufacturing concerns of the private sector in the Southern California area. As representative of this organization as it relates to protective clothing and more specifically respiratory protective devices, I have taken part along with other members of the organization in the development of California Division of Industrial Safety (Cal. OSHA) safety orders for firefighter standards that are being adopted as state law at this time.

Respectfully submitted,



Elmer N. Spraker, Battalion Chief; SAFER Vice President  
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ENS/csm