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Sent: Wednesday, December 22, 2010 12:48 PM
To: NIOSH Docket Office (CDC)
Cc: Reid, Terry; Loflin, Murrey E. (CDC/NIOSH/DSR)
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
Attachments: NIOSH EBBS Docket 147 Letter.pdf

Please find attached

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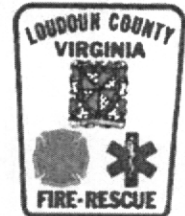
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December 22, 2010

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The Loudoun County Department of Fire Rescue and Emergency Management supports the reevaluation of the NIOSH policy on emergency escape support breathing systems (EEBSS). Improvements to respiratory protection technology along with larger air supply cylinders have rendered the present policy obsolete, and NIOSH should develop performance and certification standards for EEBSS.

NIOSH should evaluate present SCBA technology to enhance responder safety. Areas of concern include:

- ease of EEBSS operation
- minimizing entanglement hazards
- Interoperability between different manufactures.
- Reduced service life
- Training requirements

At a minimum, EEBSS should be able to support two users, each breathing at a rate of 103 liters per minute.

NIOSH should require that a minimum air supply cylinder should be used to support EEBSS, and that the 1200 liter (30 Minute) cylinder should not be used with SCBA configured with EEBSS.

Thank you for the opportunity to offer comments on this important issue.

W. Keith Brower, Jr.,

Chief of Department