August 10, 1996

Linda Rosenstock, MD
Director
National Institute for Occupational Safety and Health
200 Independence Avenue, SW
Washington, D. C. 20201

Dear Dr. Rosenstock:

The NFPA Technical Committee on Respiratory Protection and Personal Alarm Equipment is in the process of revising NFPA 1981, Standard on Open Circuit Self-Contained Breathing Apparatus for Fire Fighters. The current standard (NFPA 1981-1992 edition) has a requirement that SCBA have a NIOSH certified weight not exceeding 35 pounds. The Technical Committee would like to add language to the new standard that would allow SCBA weight to exceed 35 pounds in instances where the SCBA or components are integrated with other elements of the protective clothing or equipment that fire fighters wear.

Specifically, the proposed language would read:

4-1.1 SCBA shall have a NIOSH certified weight not exceeding 35 lb (15.9 kg).

4-1.1.1 Where SCBA or SCBA components are integrated with other elements of protective clothing or protective equipment and the combined weight exceeds 35 lb (15.9 kg), the authority having jurisdiction shall be permitted to specify a maximum weight of the SCBA with the integrated elements.

4-1.1.2 This maximum weight of the SCBA with the integrated elements shall not exceed 40 lb (18.2 kg), as allowed by 42 CFR 84.

It is the committee's understanding that current NIOSH regulations would not allow an SCBA to be certified if it were integrated with some other element of the protective clothing and equipment that fire fighters wear if the combined weight exceeded 35 pounds. While the committee is certainly concerned about weight of SCBA, we think this provision could actually result in an overall

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reduction of weight of the total protective ensemble for the firefighter. It could also lead to designs that provide more comfort and improved safety for firefighters wearing SCBA.

The next meeting of our Technical Committee is scheduled for November 15-17, 1996. We would appreciate a written response prior to that meeting indicating whether current NIOSH regulations could be changed to accommodate these provisions.

If you have questions, or need additional information, please give me a call.

Sincerely,

Ray Reed
Acting Chairman
Committee on Respiratory Protection and Personal Alarm Equipment

cc: Dr. William Halprin, NIOSH
    Bruce Teele, NFPA

Richard M. Duffy
Chairman
Technical Correlating Committee

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