Miller, Diane M. (CDC/NIOSH/EID)

From: drossos@fire.ci.portland.or.us
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To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 034-A - SCBA-EOSTI Comments

Name
Daniel Rossos

Organization
Portland Fire and Rescue

Email
drossos@fire.ci.portland.or.us

Address
4800 N.E.122nd Ave
Portland, Oregon 97230
Multnomah

Comments
I have a deep concern that this requested change would help promote a behavior that is possibly deadly or at best, very dangerous to our firefighters. The behavior of depending on your EOSTI as the indicator of when to exit a fire is very concerning. This issue has been addressed in the most recent edition of NFPA 1404, Fire Service Respiratory Protection Training. NFPA 1404 5.1.4 requires the AHJ to establish and enforce written standard operating procedures for training in the use of respiratory equipment that shall include individual air management. In that same Standard, individual air management has been broken down into three points,

1. Exit from an IDLH atmosphere should be before consumption of reserve air supply begins.
2. Low air alarm is notification that the individual is consuming the reserve air supply.
3. Activation of reserve air alarm is an immediate action item for the individual and the team.

There is a widespread desensitization to alarms in the fire service.
We have invested finances, time and training to identify a firefighter in distress by the use of the required PASS alarms, only to have them overshadowed by the non-emergency alarm of the EOSTI. To help firefighters better manage their air NFPA 1981 2002 Edition required a Heads Up Display (HUD) that will alert a firefighter when their air cylinder drops to ¾, ½ and ¼. This required equipment on all 2002 and newer SCBAs has already provided the notification they are requesting. In addition NFPA 1404 has wisely identified the need for a silent fire, and has seen the value in being able to clearly identify distress alarms when someone is truly in need. The use of EOSTI as the indicator to exit the fire is in direct opposition to the intent of NFPA 1404 and puts firefighters at extreme unnecessary risk.

I would respectfully ask NIOSH to use wisdom in evaluating how and why this requested change to the standard would be used, and what part directly or indirectly your decision could have on firefighter safety.

My recommendation is to reject the request and keep the standard as is.

Respectfully Lieutenant Dan Rossos