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NIOSH docket Office
NIOSH-034
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Reference Topic: SCBA ESLI, Docket Number NIOSH-034

To Whom It May Concern:

An article called "Expanding "Time to Exit" for Firefighters" was in the June 2004 issue of Fire Engineering. The Federal Regulation 42 CFR part 84 dealing with when the low air alarm goes off needs to be modified from 20 to 25 percent to a minimum of 25 percent of the air is present.

I am a paid on-call Firefighter/EMT with 5 years experience. I am also trained in Firefighter Rapid Intervention. If I had my choice, I would use a 45 or 60 minute bottle with the low air alarm set at 50%. This will still limit the work time to what a firefighter can take, but it will greatly increase the air that is available to exit the IDLH atmosphere.

When I am in a fire, I tend to focus on the fire and the immediate task at hand (and most firefighters I know are the same). Attempting to remember to monitor the amount of air I have in SCBA is difficult. People can say that an officer should be checking on you. But in a small department, we may have only one officer on scene initially and they have to be the incident commander and stay outside. So it will be the two firefighters going inside and the officer and driver outside. In the pressure to do the all the tasks, asking for air status falls by the wayside. Therefore having the low air alarm activate when I still have enough air to safely exit is vital. If I am in a large commercial structure, the standard 4-5 minutes of exit time may not be enough and that would be

Sincerely Yours

rec'd
11-9-04