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Sent: Thursday, July 31, 2008 4:06 PM
To: NIOSH Docket Office (CDC)
Subject: NIOSH Docket #123
Attachments: Comments docket July 2008 O2 Prohibition.doc

Hello:

Attached please find Draeger Safety's comment on NIOSH DOCKET – 123: Positive-Pressure, Closed Circuit, Self-Contained Breathing Apparatus (SCBA) – NIOSH Oxygen Prohibition. Please forward to the appropriate personnel.

Regards

Bob Sell

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July 31, 2008

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Reference: NIOSH DOCKET – 123: Positive-Pressure, Closed Circuit, Self-Contained Breathing Apparatus (SCBA) – NIOSH Oxygen Prohibition

Dear Sir/Madam:

Draeger Safety for decades has been a worldwide and well-known manufacturer of Closed Circuit Breathing Apparatus (CCBA) and has sold thousands of units into various markets and applications to the full satisfaction of the user. Therefore we offer the following comments in response to the recently posted NIOSH Federal Register Notice for Comments on, Positive-Pressure, Closed Circuit, Self-Contained Breathing Apparatus (SCBA) – NIOSH Oxygen Prohibition, dated January 25, 2008:

In 2005 Dräger celebrated the 100 year anniversary of providing Closed-Circuit Breathing Apparatus (CCBA) to the world markets.

The CCBA's were originally designed to support Miners for rescue missions and it was adopted in 1911 by the Pittsburgh, PA Fire Brigade as a respiratory protection device.

In the years to come the Dräger CCBA's have always been used as breathing apparatus for Mine Rescue missions as well as a long duration breathing apparatus for various applications within the fire service. No incidents have been reported to date regarding the use of CCBA's while being used in fire fighting applications.

When stricter regulations were created in the 1990's by the association for the Promotion of German Fire Safety (VFDB) the PSS BG 4 was tested and passed the requirements of this standard with no deviations. As noted in the Federal Register Notice this standard is similar in nature to heat and flame test that is performed in the NFPA 1981 Standard on Open-Circuit Self-Contained Breathing Apparatus (SCBA) for Emergency Services

With more complex tasks coming up for fire brigades (i.e. Tunnel fire fighting; fires in high rise buildings; fires on ships and more) the CCBA has proven to be a useful device extending the range of respiratory equipment needed by the fire brigades. One successful example of a BG4 CCBA being used in a fire fighting application occurred on July 18, 2001 when a railroad tanker caught fire in the Howard Street Tunnel in Baltimore, MD. In the first attempts by the Baltimore Fire Department to approach the fire it was found that the duration of an Open-Circuit SCBA did not

allow the fire fighter to approach the incident, perform their fire fighting operations, and exit the scene and have any useful affect due to the volume of the compressed air in the cylinder. In order to access the situation and to put out the fire the fire department resorted to using the four hour BG4.

The Closed-Circuit Self-Contained Breathing Apparatus concept standard dated May 28, 2008 is proposing to incorporate a heat and flame requirement as an option for fire fighting applications. Draeger Safety believes that this is a positive approach and with the conformance to the flame engulfment test it shows that the components and materials used is able to continue to support life during and after the test. However there is a limitation when using positive pressure CCBA in a fire fighting application if the equipment is not donned or properly maintained by the user. Therefore, Draeger Safety recommends removing the current "Limitation" which states: "Do not use this apparatus where there is direct exposure to open flames or in high radiant heat" and replace it with the following:

Limitation

"When using closed circuit positive pressure breathing apparatus for extended duration in high radiant heat and exposed flames it must be ensured that the equipment is fully tested and functional as required by the manufacturer and that the wearer has a correctly fitted facepiece.

Failure to ensure the above may cause the equipment to support burning in and around any leaking area including the head-facepiece interface."

Based on the experience of Draeger in the use of Draeger CCBA's and the positive test results reported it is the recommendation of Draeger Safety to change the actual NIOSH O₂ prohibition into a limitation with the above content.

Draeger Safety thanks NIOSH for the opportunity to provide comments.

If there should be any questions concerning this matter, please do not hesitate to contact me at 412-788-5685 or via e-mail at Robert.Sell@Draeger.com.

Respectfully,

Robert Sell

Draeger Safety, Inc.
Sr. Project Engineer

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