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Subject: 034-A - SCBA-EOSTI Comments

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Comments

There needs to be a performance requirement for all SCBAs. Any new performance requirement SHOULD address the issue of freezing in outdoor/cold operations - the biggest problems I've had is typical of the fire service - perform on-air entry, sweat, exhale lotsa moisture, come out, brief, rehab, change bottle, then go back in. On many of our high-altitude, night-time, winter fires, the regulator freezes solid, making the pack useless/dangerous on the 2nd entry (or if entry is delayed, & the user goes on-air, then comes back off-air (delay) then has to go back on-air to perform in a hazardous atmosphere.

A minimum value for the new standard is better, and should include continuous alarm once reached. 20% of available air is a reasonable minimum. The new standard should allow MORE CONSERVATIVE settings (such as 25% or 30% &tc.) to be used-defined based on their particular situations/conditions.

There are differences between fire/rescue & industrial applications - industrial may have more controlled environmental variables than an emergent situation. I don't know whether this should translate to a different standard for each application.

All warnings & indicators s/b accurate to a tolerance that never gets below the 20% minimum warning standard (so if the set-up was only 20% accurate, the minimum for that pack s/b 25% volume before alarm (25%-5%=20% min). If the warning device is accurate to within 10%, then the minimum air alarm s/b set at 35%. No warning device should be allowed to have a greater than 10% inaccuracy.