

Dragon, Karen E. (CDC/NIOSH/EID)

From: ryoung@city.stratford.on.ca
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To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 221 - NIOSH Regulatory Agenda for updating 42 CFR Part 84 Comments

Name
Richard Young

Organization
Stratford Fire Department

Email
ryoung@city.stratford.on.ca

Address
388 Erie Street
Stratford, Ontario N5A 2N4
Canada

Comments

We believe that NIOSH should immediately modify 42 CFR Part 84 to allow for separate, stand-alone approval of cylinders.

Maintaining the current packaged standard adds excessive user costs and does not demonstrate any added value or safety measures to users.

A separate standard for cylinders causes no harm; it helps to certify the safety that is inherent in the DOT-approved cylinders by yet another third party, providing buyers confidence in safety "and providing much needed monetary relief for fire departments and municipalities nationwide.

We applaud the fact that NIOSH is requesting comment for updating standard 42 CFR Part 84. It is truly the opportunity to level the playing field for fire departments (and the taxpayers and municipalities they serve) as well as cylinder manufacturers.