

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

From: Rick Nickels [rnickels@hydrostat.com]
Sent: Thursday, March 17, 2011 3:05 PM
To: NIOSH Docket Office (CDC)
Subject: Docket #221

To whom it may concern;

This letter is in regard to Docket #221. As a hydrostatic testing facility where we have tested over a half million cylinders and as a safety equipment inspector, I have the experience to be able to state that one DOT specification air container approved by DOT holds air as well as the next one. The proof of this is that all of the major US cylinder manufacturers have had, or do have, their cylinders in use in approved SCBA configurations. While cylinder shape, pressure rating and valve configuration may affect the fit, form and function of a breathing apparatus, excluding these three features, there is no reason that a DOT approved cylinder, by any manufacturer, in the proper configuration, should not be used. To state otherwise smacks of market manipulation at worst and inadequate research at best. We conduct visual inspections and Biosystems posicheck flow tests of all brands of SCBA apparatus and I can tell you without a doubt, that we have never had a unit fail a flow test because of having a generic or off brand cylinder attached. To say otherwise lessens the credibility of all rules. For this reason alone, a measure of common sense and practicality needs to accompany the rulemaking process so that an intelligent person can appreciate why the rules exist. Therefore I request that NIOSH adopt a Policy of cylinder approvals that will allow for practical and effective market place competition for price and quality among manufacturers or use the existing simple standard of DOT approval.

Yours in Safety,
Rick Nickels
Hydro-Stat Inc.

Shop 954 428 7677
Cell 561 889 8166
WATS 800 780 7780
rnickels@hydrostat.com