

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

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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

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Comments

My department would like to see NIOSH change it's wording on 42 CFR part 84 to allow seperate testing and approval of SCBA bottles in order to allow us to purchase our SCBA bottles at a substantially lower price due to significant budget constraints with the current economy. At this time we cannot meet requirments for replacing bottles due to our tight budget and would like the flexibility to purchase DOT approved bottles from another source. Currently there are several bottle manufacturers of bottles who make bottles for the various SCBA manufacturers and NIOSH only approves buying these bottles through the SCBA manufacturer who marks up the price to the point that we can only afford half the needed bottles for our department. The SCBA manufacturers buy these bottles from the bottle manufacturer based on bids and we have bottles in service from multiple bottle manufacturers which were purchased through our SCBA distributor. It does not make sense that we can't purchase the same bottles straight from the bottle manufaturer at a discounted price. Due to the economy and our budget crisis I don't know how we will continue to operate without serious cuts which could effect safety or service if this is not changed as we can not maintain a bottle replacement schedule that meets current NIOSH guidlines.

Jay Crawford