

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

From: Rich Rock [richr@maplevalleyfire.org]
Sent: Wednesday, March 30, 2011 7:45 PM
To: NIOSH Docket Office (CDC)
Cc: Matthew H. Cowan
Subject: 42 CFR Part 84; Reference Docket #221

NIOSH review Committee,

I am writing in regards to the updating/review of the 42 CFR Part 84 dealing primarily with SCBA cylinders.

We, as a department, would like to see 42 CFR Part 84 changed to allow for a separate NIOSH approval for SCBA cylinders. This would allow us, as a fire department, to purchase cylinders from vendors other than a specific single source SCBA manufacturer.

As I understand it, the current NIOSH approval certifies a SCBA Respiratory system as an entire unit (Air Pack, Cylinder Valve and Cylinder). To meet the NIOSH approval, cylinders are required to meet Department of Transportation (DOT) approval. All SCBA cylinders produced and transported in the US and Canada are already federally regulated by the United States Department of Transportation (USDOT) and Transport Canada. With these regulations already in place, the NIOSH approval process does not provide any additional liability protection to us, the end user. All it does is increase the cost for replacement cylinders by limiting where we can purchase replacement cylinders. With the economic conditions the way they are, fire departments need to be fiscally responsible so that we can maintain our operational staffing. Changing this regulation would dramatically help organizations, like us, that use SCBA respiratory systems by reducing the costs associated with replacing SCBA cylinders.

I understand that a cylinder needs to be tested and approved. We feel that the cylinder itself should probably have a separate NIOSH approval, but it should not be limited to a single SCBA manufacturer. Please take this and other information into consideration when you review this regulation. Thank you for your time and consideration.

Sincerely,

Richard Rock
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