

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

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**From:** ngfr1@maine.rr.com  
**Sent:** Monday, October 19, 2009 11:45 AM  
**To:** NIOSH Docket Office (CDC)  
**Cc:** Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)  
**Subject:** 083-B - Supplied Air Respirators (SAR) Comments

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**Comments**  
To Whom It May Concern;

I am opposed to any rule that would make it impossible to use an air bottle that was constructed to the D.O.T. standard and used for its intended purpose but needing to be part of the "assembly" per airpak manufacture. Presently some standards have it that if a manufactured bottle was not tested as part of the SCBA than you would not be in compliance. As an example; I have Scott SCBA units and some bottles supplied based on the date of purchase were manufactured by SCI and another set by Luxfer. Both meet the bottle standard but by I'm advised that I could be sited if a pack was not tested with one or the other. I know of no SCBA manufacture who manufactures the bottles themselves so there is a potential to have three brands of bottles labeled to the SCBA companies name. I at this time am pushing other Chiefs in Cumberland County and the state of Maine to join with me to work with our Department of Labor to be able to purchase bottles directly from the manufactures of the bottles themselves without the risk of citation. How is it that I have a "Scott" bottle manufactured in 1999 by SCI when we purchased some air packs and I'm told that I cannot use a replacement bottle purchased directly through them for \$450 and that I have to purchase a Luxfer from Scott because that's who won the Scott bid and my cost is \$900, twice the cost!! Also it's a known fact that the bottle manufactures backup each other when they have to produce large quantities of bottles.

Please keep the pack assemblies separate from the bottle manufactures in an effort to help control the costs. We don't regulate what nozzle goes with what hose and than to a certain manufactured truck so why with just SCBA???

I thank you for allowing me to comment and please give my comments serious consideration.

Chief Sacco