

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

---

**From:** Mike Wright [Mike.Wright@guilford-es.com]  
**Sent:** Monday, March 14, 2011 12:43 PM  
**To:** NIOSH Docket Office (CDC)  
**Subject:** Docket #221  
**Attachments:** NIOSH NFPA Request for consideration CFR 49 Part 84.docx

Gentlemen,

I am writing to ask that consideration be given to revisiting the regulatory standard of "42 CFR part 84 and the process to permit component cylinder approval". As a fire service professional and government agent responsible for fiscal accountability I am constantly challenged with regulatory compliance and budgetary constraints. Upon review of the information contained in the CFR regarding approval of SCBA systems, there exists the following statement;

*"NIOSH approvals are applied for and granted for, an entire respiratory system such as an SCBA (including the cylinder) to the respirator manufacturer and not for individual components"*

Because the cylinders meet a stated federal DOT standard and it is understood that the majority of SCBA cylinders are provided by a limited number of vendors; I would respectfully request that the standard be reviewed and if possible revised to allow for cylinders which meet a stated compliance standard be used as a replacement cylinder without compromise of the NIOSH and NFPA approval. Your consideration of this matter is greatly appreciated. I have attached a letter on letter head stating the same if it is needed.

Mike Wright  
Operations Deputy Director  
Fire Service Division  
Guilford County Emergency Services  
336-641-7565  
Mike.Wright @ Guilford-es.com



**GUILFORD COUNTY EMERGENCY SERVICES**  
**FIRE SERVICE DIVISION**  
**(336) 641-7565**

Monday March 14, 2011

Gentlemen,

I am writing to ask that consideration be given to revisiting the regulatory standard of "42 CFR part 84 and the process to permit component cylinder approval". As a fire service professional and government agent responsible for fiscal accountability I am constantly challenged with regulatory compliance and budgetary constraints. Upon review of the information contained in the CFR regarding approval of SCBA systems, there exists the following statement;

***"NIOSH approvals are applied for and granted for, an entire respiratory system such as an SCBA (including the cylinder) to the respirator manufacturer and not for individual components"***

Because the cylinders meet a stated federal DOT standard and it is understood that the majority of SCBA cylinders are provided by a limited number of vendors; I would respectfully request that the standard be reviewed and if possible revised to allow for cylinders which meet a stated compliance standard be used as a replacement cylinder without compromise of the NIOSH and NFPA approval. Your consideration of this matter is greatly appreciated.

Mike Wright  
Operations Deputy Director  
Fire Service Division  
Guilford County Emergency Services  
336-641-7565  
Mike.Wright @ Guilford-es.com