

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

From: rchatton@pittmeadows.bc.ca
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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

Name

Robert Chatton

Organization

Pitt Meadows Fire Rescue

Email

rchatton@pittmeadows.bc.ca

Address

12007 Harris Road
Pitt Meadows, BC V3Y 2B5
Canada

Comments

With shrinking budgets and Cities being asked to do more with less, it doesn't benefit anyone to tie the hands for end users of SCBA. The current NIOSH regs-42 CFR Part 84 do just that by not recognizing a single component such as an air cylinder.

Firefighters PPE, turnout gear, is tested and rated in pieces as there is no one manufacturer who produces everything (helmet, Balaclava, jacket, pants, boots gloves). However when all these components (that are individually certified) and put together and correctly used by an adequately trained person, they function extremely well to protect the wearer.

Could this not be the same for SCBA?

Let's look at SCOTT SCBA. Scott manufactures (or assembles) an apparatus to provide respiratory protection in an IDLH atmosphere. I don't believe SCOTT manufactures ALL the components, I do know for sure they do not manufacture the air cylinder, this is done by Luxfer. So if a certification can be given in that case, why not with a Cylinder (manufactured to a set of standards) other than Luxfer? Seems straightforward at this point?

If additional testing needs to be done, couldn't that occur so it follows the same test as SCOTT/LUXFER does?

While we strive to make sure our Firefighters are kept safe by using equipment designed for that purpose, we also need to ensure we can continue to function without causing undue hardship on the taxpayers. In BC, there is NO LEGAL LAW OR REQUIREMENT to provide fire protection. If a Municipality and its Citizens wish to have that service, it comes at a cost. We have already seen where that cost is too much and that service has been withdrawn or greatly reduced.

With such a simple process potentially available to test and certify aftermarket products, why would we not allow this in order to offset cost to help provide the best service money can buy?

Thank you,
Robert Chatton

Assistant Fire Chief,
Pitt Meadows Fire Rescue