

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

From: randy.leazer@usmc.mil
Sent: Tuesday, March 29, 2011 10:30 PM
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
In regards to this standard change is needed to provide for a separate compressed breathing air cylinder standard.

1. NIOSH should provide a "Separate Cylinder Approval" which will allow users to choose cylinders from more than a single source.
2. There needs to be a interoperability standard mandated upon all SCBA manufacturers to ensure that all our Air Packs can use one anothers cylinders regardless of the maker. They need to be standardized by pressure and connection types.
3. Elimination of the cylinder from the ensemble approval would save Fire departments millions of dollars annually which could be better used for other purposes and be more beneficial to the tax payers. The current standards promote waste and creates a monopoly on manufacturers.
4. It would also be nice if you would do the same to respirator cartridges so that one may use any cartridge on any rated respirator mask.