

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

---

**From:** kldrake@worthingtonindustries.com  
**Sent:** Wednesday, March 30, 2011 10:41 AM  
**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  
Ken Drake

Organization  
Worthington Industries / Highland, IN Fire Dept.

Email  
[kl Drake@worthingtonindustries.com](mailto:kl Drake@worthingtonindustries.com)

Address  
3521 Highway Ave  
Highland, Indiana 46322  
USA

### Comments

I have to admit that my involvement in this could be considered a conflict of interest as I work for a company that manufactures cylinders and also work for a VFD that purchases and utilizes these same cylinders.

But I do feel that this is a valid issue and an unfair addition of cost to the fire service that can be eliminated.

SCBA are expensive yet required for fire fighter safety. Each SCBA can cost anywhere from \$1,500 to \$2,000 depending on the type and extras that come with it. And on our dept, we keep approx 2 extra bottles in reserve for each full SCBA pack.

As you are aware, bottles can be damaged easily and need to be replaced on a regular basis. If a FD is limited on who we can purchase these tanks from, the price will be higher because open competition is not possible.

Paying a higher price for a replacement bottle takes funds away from other areas where these funds are needed.

I won't pretend that I know what the cost saving will be annually as I am not involved in our dept's finances. But, common sense says that if you can pay a lower price for the same quality and approved bottle, it is a positive for the dept.

I would not be in favor of changing the current standards if I felt that it would endanger my safety or the safety of my fellow FF's.

I hope that you take my comments into consideration during your decision making process and I appreciate your time in reading this.