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

From: ggraebel@richmond.ca
Sent: Wednesday, March 30, 2011 6:50 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
The Problem:
1. Respirator manufacturers are issued NIOSH approvals for Cylinders they don't manufacturer 2. NIOSH provides approvals for "entire SCBA ensembles only", limiting competition for replacement cylinders 3. Current approval system unnecessarily drives up the price end users pay for replacement cylinders 4. NIOSH approval process is redundant; cylinders are already federally regulated by the USDOT & Transport Canada 5. NIOSH approval process provides NO additional liability protection to users

Financial impacts:
□ Fire Departments pay excessively high prices for spare & replacement SCBA cylinders from respirator manufacturers - yet receive no added benefits □ Current system negatively impacts Fire Departments & End User budgets □ Municipalities and other governments budgets are negatively affected

Product impacts:
□ Approval holders do not manufacturer cylinders; as a result, they serve as a barrier between cylinder manufacturers and end users limiting cylinder innovation & improvements

Safety impacts:
□ NIOSH approval process does not improve or ensure the safety of cylinders □ NIOSH approval already requires cylinders be DOT approved, inclusion of the cylinder into the ensemble approval ads no additional measure of safety

How can these issues be resolved?
1. NIOSH should provide a "Separate Cylinder Approval" which would allow users to choose cylinders from more than a single source 2. Elimination of the cylinder from the ensemble approval would save Fire departments millions of dollars annually which could be better used for adequate staffing and other department needs

Thank you for your consideraton,
Captain God Graebel