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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
NIOSH Docket 221 42 CFR Part 84

NIOSH should consider any / or all of the following substantiations, for easing the NIOSH air cylinder requirements associated with the NIOSH approval for SCBA respirator ensembles.

1. NIOSH should provide a separate cylinder approval process for cylinders used on SCBA's. Accepting a DOT certification and the existing exemption number for the cylinder can establish a cylinder as approved for use with an SCBA respirator. NIOSH already requires and accepts the DOT certification. There can be no doubt to the safety and use of a DOT certified cylinder when used with an SCBA ensemble.
2. The cylinders currently used in an NIOSH SCBA respirator certification are not manufactured by any of the SCBA manufacturers. These identical DOT certified cylinders are available on the open market. The current NIOSH approval requirements, restricts an end user to purchase and use this identical DOT certified cylinder by suggesting it does not meet a NIOSH approval because it does not have an SCBA manufacturers part number on it. Even though, it could be the same exact cylinder, made by the same manufacturer. This is clearly an obstructive, restrictive requirement with no practical application to the fit, form or function of the SCBA. Accepting the DOT certification and exemption number establishes the cylinders integrity, performance and size specifications.
3. An air cylinder valve has a manufacturers part number. A cylinder valve with a NIOSH approval for use on a DOT approved cylinder and exemption ensures SCBA ensemble integrity.
4. Though well intended, the current NIOSH approval requirements for SCBA ensembles enables and creates a no compete air cylinder market. This NIOSH requirement allows SCBA manufacturers to monopolize pricing charged to end users. To a large department, the cost differences are astronomical.

Again, the DOT certification for a cylinder, that has been approved for years by NIOSH, for use with a manufacturers SCBA, warrants the NIOSH SCBA (cylinder) ensemble approval requirement be rescinded.