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Sent: Tuesday, March 29, 2011 11:22 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

Under docket #221 -I believe NIOSH should change 42 CFR Part 84 to allow for separate "cylinder-only" certification for use with any manufacturer's SCBA unit because virtually any cylinder can, and is in fact, currently used with any SCBA unit, providing the pressure rating of the cylinder matches that of the Breathing Apparatus. Different types of tanks are found in nearly all fire deopartment' s inventories because of batch buying to replace cylinders that are damaged or go out of date. They are manufactured to high standards and are interchangeable with older or new SCBA gear.They are never tied to one particular unit and as such should be viewed as a separate product.MSA does not manufacture it's own cylinders, it relies on other manufacturer's to make a product that is compatible ith the product MSA makes. To tie certification of a tank to the SCBA manufacturer is penalizing the cylinder manufacturing industry and every fire department in North America. It is unfair!