

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

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**From:** wjones@fire.cityofperryville.com  
**Sent:** Wednesday, March 30, 2011 4:04 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 regulation that requires the SCBA unit to be tested as a single product by NIOSH (which includes the air cylinder from the SCBA manufacturer) needs to be revised in order to allow SCBA Air Cylinders, from cylinder manufacturers other than the SCBA company, that meet the DOT standards for SCBA Breathing air bottles, to meet the same NIOSH approval as the cylinders that are manufactured for the SCBA company. The DOT-CFFC approval is a very thorough certification method, all air cylinders currently sold by the SCBA manufacturers as well as the same cylinders from the cylinder manufacturers carry this certification. It is ridiculous and very cost prohibitive to purchase spare and replacement cylinders from the SCBA manufacturer at up to three times the price as compared to purchasing the same or better cylinders from the cylinder manufacturer directly. It is amazing what the name brand of the SCBA labeled onto the air cylinder does to the price of the cylinder while not doing anything for the safety aspect, the SCBA manufacturers have got way out of hand in prices on the very same bottles that could be bought directly from the manufacturer and by NIOSH only providing the single product certification (which includes the cylinder) this allows the SCBA manufacturers to keep costs on the air cylinders artificially high. We at this department and at the regional fire officers and chiefs meetings feel that NIOSH should immediately modify 42CFR Part 84 to allow for separate, stand-alone approval of cylinders. We further believe that maintaining the current packaged standard adds excessive user costs and does not demonstrate any added value or safety measures to the users.