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Sent: Wednesday, March 30, 2011 9:26 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

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Comments

OSHA & NIOSH need to get out of the "cylinder" qualification business.

Cylinder qualification and re-qualification is covered under the auspices of 49 CFR, not 29 CFR or 42 CFR. I can find no scientific evidence that OSHA or NIOSH have ever performed any analytical testing on any type of SCBA cylinder to determine its fitness for use with a breathing apparatus.

This includes CBRN testing. THE CYLINDER IS NEVER TESTED. SCBA Cylinder suitability and fitness, under Federal law, are covered by U.S. Department of Transportation directives and Compressed Gas Association (CGA) guidance.

Many of the same Special Permit Composite Cylinders are used by the various manufacturers of breathing equipment such as Draeger, Scott, Interspiro, MSA, etc. The only difference between the cylinders is corporate logos. Besides, breathing apparatus manufacturers don't make the cylinders. More often than not these manufacturers don't make the cylinder valves, either. The idea of making the cylinder part of the "ensemble" makes no sense, other than to create another level of Government bureaucracy. Users and entities should be allowed to access the free-market for "DOT APPROVED" cylinders.