

**Dragon, Karen E. (CDC/NIOSH/EID)**

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**From:** inabinet-s-arfd@sc.rr.com  
**Sent:** Wednesday, March 30, 2011 1:51 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

I would like NIOSH to seriously consider revising Title 42, Part 84 to allow for a separate cylinder approval for firefighter SCBA's. This change would allow us to purchase replacement cylinders and spares from different vendors at roughly \$300 less per cylinder based on recent quotes that we've requested. After comparing the manufacturer supplied cylinders to non-manufacturer supplied cylinders, we found that both had the required DOT approval and were virtually identical with the exception of cost and manufacturer labeling.

I believe that this requested change to Title 42, Part 84 is a common sense approach that would help reduce some of our increasing operating costs and would have no impact on the safety of my firefighters.

Thanks you for considering my comments.

Chief Scott Inabinet  
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