

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

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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

In regards to the updated portions of Title 42 Code of Federal Regulations Part 84, I respectfully suggest a separate approval of SCBA cylinders.

The current approval system unnecessarily drives up the price end users pay for replacement cylinders. Fire Departments pay excessively high prices for spare & replacement SCBA cylinders from respirator manufacturers, yet receive no added benefits.

NIOSH approval already requires cylinders be DOT approved, inclusion of the cylinder into the ensemble approval adds no additional measure of safety.