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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

I have an interesting perspective on this. I recently purchased 220 new SCBA's from a manufacturer. They were upgrades so no cylinders were purchased. They were approved with a Luxfer cylinder as a unit. My department has both Luxfer and SCI cylinders from the previous purchase of packs from the same manufacturer. When I was told I could only use Luxfer cylinders for replacements I asked if the SCI cylinders that came with the old units, that are still good, could be used with the new packs since they sold them to me earlier. They had no solid answer. After all I had these cylinders from my original purchase. They did not want to say no because that would have affected the sale. So I have all new SCBA's and all old cylinders with five years of life left. The manufacturer knew I had both brands of cylinders and knew I would be using them. As I read OSHA's standards 1910.156 & 1910.120 the cylinders are interchangeable. The only requirements are that the cylinders are of the same capacity and pressure rating. They must also meet DOT and NIOSH criteria. Standards and regulations are a great thing but let's not over regulate. Rate the SCBA's as a unit with a cylinder not a brand name. An SCI carbon fiber wrapped 4500 is the same as a Luxfer carbon fiber wrapped 4500 according to DOT and NIOSH. Please regulate the cylinders and the packs separately. Do not hard and fast this. I think there are more situations like mine out there.

We have been using two different brand names (same cylinder) of cylinders in the same SCBA for over ten years now with out any issues. NIOSH does not need to get into the habit of endorsing brand names. They should regulate safety standards for SCBA's and cylinders separately. If you want to combine this then do it by cylinder capacity and pressure. Not by brand name.