

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

From: Charles Sanford [charles@metrofireandsafety.com]
Sent: Thursday, March 31, 2011 2:58 PM
To: NIOSH Docket Office (CDC)
Cc: 'Needham, Allen H Jr'
Subject: Docket #221 42 CFR Part 84

Please do not adopt the "Ensemble Approval". This will place financial hardships on all fire departments and any end user who uses SCBA units when the time comes to replace their cylinders due to the 15-year age limit. The large SCBA manufacturers have gouged their customers for years charging exorbitant prices for their replacement cylinders. It was not until Structural Composite Industries began marketing their cylinders directly to end users that we began to get help with the budget issues that everyone has.

As a DOT Retesting Facility, I can tell you that all cylinders are basically the same. The SCI cylinders we have tested are no different than the Luxfer. This merely is an attempt on the part of Interspiro, Scott, Sperian and others to force end users to come directly to them to purchase replacement cylinders. With the present economic environment this will place dire hardships on all departments, whether large or small. Also, as a Deputy Chief of a small combination fire department I would appreciate your refusal to adopt this measure. Help the professionals who serve your community and refuse to fatten the pockets of large corporations.

Charles Sanford - President
Metro Fire & Safety, Inc.