

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

From: mcomer@townofmadison.org
Sent: Tuesday, March 29, 2011 6:02 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

Our fire department currently utilizes (29) Scott 4500 psi air packs. In the next 5 years we will be in the process of acquiring replacement air bottles. This is due to current bottles will have achieved the 15 year limit on composite air bottles. We have to phase the bottles out over the next few years due to local economic downturns. Due to these budget limitations we have to go to numerous vendors for the most cost efficient pricing. We feel that current DOT regulations on SCBA bottles are stringent enough. We also feel that if cylinders were to be regarded as part of the SCBA unit that the individual SCBA manufacturers could in fact charge extra for purchasing replacement bottles. This could affect the safety of firefighters due to budgetary limitations of the current economy. Fire departments on limited budgets could not afford to purchase other safety equipment. We express our concern over this situation. We offer that only the SCBA itself and the valve assembly of the SCBA bottle should be proprietary. We thank you for your support in this matter.