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To: NIOSH Docket Office (CDC)
Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 083-B - Supplied Air Respirators (SAR) Comments

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Comments

You have never regulated cylinders as part of the SAR. Structural Composite Industries cylinders as an example have performed without failure or injury to users since their beginning in 1976. These Cylinders are rigorously regulated by the Department of Transportation (DOT) and Compressed Gas Association (CGA). Additional regulatory considerations proposed by NIOSH that incorporate cylinders into the SAR will be redundant and result in over regulation and not improve worker safety. If sufficient concerns exist regarding the quality of Air Source systems (whether fixed or portable), NIOSH should consider separate approvals for Air Sources instead of integrating Air Sources with the Respirator. Doing so would allow end users to choose the appropriate combination of Approved Respirators and Approved Air Sources. End users and departments can only stand to benefit from not allowing this inclusion to go forward.

Currently end-users have choices of different types of cylinders to choose from outside of their OEM SAR cylinders which offer them increased flexibility, to not mention the cost savings. With this inclusion the choices in cylinders currently by end-users will be removed and the OEM SAR manufactures will control the market and offer even higher priced cylinders made of less quality, which will not last till their 15 year end of service life and have to be prematurely replaced. This will provide higher costs to end users who will turn to cylinders and products which will increase user's fatigue and stress causing greater reduction in the user's ability to perform tasks and pose potential safety risks.