

Miller, Diane M. (CDC/NIOSH/EID)

From: Fire Chief [firechief@dixfield.org]
Sent: Thursday, March 17, 2011 9:49 PM
To: NIOSH Docket Office (CDC)
Subject: NIOSH Docket #221

To Whom It may Concern:

RE: Docket # 221

I am writing to support the elimination of the SCBA cylinder from the "Ensemble Approval" process for Supplied Air Respirators as regulated by 42 CFR Part 84.

The current NIOSH approval process for the use of SCBA cylinders is in need of revision. Since SCBA cylinders are regulated by the United States Department of Transportation there is no need or justification for NIOSH to grant exclusive rights to SCBA manufacturers requiring the use of cylinders branded only by the specific SCBA manufacturer. The only thing this requirement does is inflate the cost of cylinders to the end-user. It does not add any other value such as quality or safety.

The majority of fire departments in the U.S. are small volunteer departments similar to my own. We operate on small taxpayer-funded budgets (or in some cases privately raised funds) and have to stretch every dollar in order to provide the necessary equipment to meet State and Federal requirements. By forcing us to comply with the above referenced scenario we are not able to purchase the same quantity of SCBA cylinders that we could if we had access to third-party options.

The rationale that the cylinder is integral to the entire SCBA unit is flawed. If in fact a SCBA could only be used with a cylinder it was tested with we would never be able to use any other cylinder than the very one that the initial test was done with. The minute a different cylinder is placed on a SCBA, you would have a totally different SCBA assembly. In the fire service we change cylinders ALL the time – we can't possibly refill the same cylinder on a SCBA pack before we use it again.

As an example - in my department I have cylinders that are manufactured by company XYZ and branded by SCOTT; I also have the exact same cylinder made by XYZ, not branded by SCOTT, and yet I can't "legally" place that cylinder on my SCBA in a ready position. Both are manufactured to the same strict USDOT requirements – same components, same valve, and yet I can't use it. This makes no sense to me; and it makes no sense to my taxpayers. The exclusive monopoly of a manufacturer branded cylinder costs small communities, such as Dixfield, hundreds of thousands (if not millions) of dollars a year. We can't afford not to have access to all competitive products.

Again, all cylinders are subject to the same strict requirements of USDOT; the NIOSH requirement doesn't provide me with any added safety; it doesn't offer me availability to longer life, or less expensive, or superior cylinders. This request for change isn't made to punish the SCBA manufacturers; it is simply made to provide much needed budget relief and control over the products we chose to purchase. Please allow us the option to make the right purchasing decisions for our communities and get as much product for the dollar as we can. By eliminating the cylinder from the ensemble process, the cost of cylinders will come down and we will have the option to purchase from either third party cylinders, or SCBA branded cylinders at a lower price – free market economics.

Thank you for your consideration of this important matter. I trust that you will make the logical and moral decision to eliminate the cylinder from the SCBA approval process.

Sincerely,

Scott R. Dennett
Fire Chief
Dixfield Fire Company
PO Box 808
38 Main Street
Dixfield, ME 04224

Station 207-562-7629
Cell 207-357-4868
Fax 207-562-4311