

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

From: Joseph Dooley [jdooley@fire.linden-nj.org]
Sent: Tuesday, March 29, 2011 8:39 PM
To: NIOSH Docket Office (CDC)
Cc: Melson, Drew
Subject: Docket #221

To Whom it May Concern.

As you go forward in reviewing 42 CFR Part 84 NIOSH SCBA Approval standard, please consider either a separate approval or removing the cylinder from the approval process all together.

I am sure by this point all of the relevant technical arguments have already been made to you in detail. From the end users point of view the need is clear. With there being no difference in performance and quality due to the requirement to meet DOT guidelines the issue becomes economics. SCBA Cylinders represent a significant financial investment for all departments. With a designed limited lifespan a significant part of our budget must be committed to replacing cylinders frequently. As our budgets shrink we are being told to do more with less. The opportunity to purchase SCBA cylinders at a lower cost and with a longer life span is too valuable to ignore .

Within the next couple of year the Linden Fire Department will need to start replacing approx 150 cylinders at a cost of approx \$120000. By changing 42 CFR part to either allow using different cylinders in SCBAs or removing the cylinders from the approval process could potentially save our Department \$60,000.

There is no technical reason not to allow interoperability in SCBA cylinders. DOT sets the standard. OSHA allows their use in certain situations. Now is the time to acknowledge the benefits and change the approval process.

Sincerely

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