

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

From: jhearnsberger@championsfire.org
Sent: Wednesday, March 30, 2011 1:51 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
NIOSH
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Docket #221

To whom it may concern:

I am writing to urge NIOSH to consider revisions to 42 CFR part 84 to allow separate cylinder approval rather than the current standard requiring cylinders to be tested as part of the overall ensemble. As the officer within my organization responsible for safety equipment purchasing, I believe that permitting separate cylinder approval will allow my department to consider, evaluate, and make informed decisions on replacement cylinders based on a competitive evaluation process. With the bulk of my current fleet of SCBA cylinders coming to the end of their service life in early 2013, avoiding the monopolistic practices of the respirator manufacturer will allow us to consider alternatives which may offer higher quality at a reduced price. Considering our current economic situation, I am forced to make hard choices with regard to our limited resources. Personnel safety considerations should not be one of those choices. Allowing end-user evaluation and choice in the field of replacement cylinders may allow my staff to create significant savings that can be passed along to my citizens, or redirected to other critical needs. Please allow for the elimination of the cylinder from the ensemble approval process and provide for a separate cylinder approval process within 42 CFR part 84. Such action will ensure firefighter safety while allowing competition and cost savings to the fire services, and subsequently the tax-paying public.

Respectfully,

Jason Hearnberger
Assistant Fire Chief
Champions Emergency Services District "Harris County ESD #29 Houston, TX