

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

From: rhondarobertb@aol.com
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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

In My 20 years in the volunteer fire service i have seen many advancements in the fire service . As a captain and training officer I believe in progression and innovation .I have read and inquired into the life expectancy of scba bottles and packs . I find it to be a very strange yet intriguing part of the fire service. I feel very strongly that niosh on a safety standard continue to keep a close eye on the composite bottles used in the fire service today . The average firefighter in the field today have come to have an unwavering trust in you for there safety. I have some strong concerns that bottle manufacturers are attempting to extend bottle life cycles to 30 and sometimes more years . In all honesty with the use and wearand tear of todays firefighter i feel that 15 years is even pushing the envelope.Oddly enough they a few years back they went to carbon fiber and extended the hydrostatic testing to a 5 year interval.

This alarmed me and through research i discovered that this was done for 2 reasons , this limited the number of times the valve was removed from the bottle and secondly made these bottles more cost friendly to the fire service due to a decresed life expected maintenance cost. With all the problems with the carbon fiber bottles in the past with neck failure it seems we should want to check the bottle necks more often not less.I also feel that puts all firefighters in an even more sense of false security that these are taht much better.

I urge the people that are in charge of regulating the safety standards to keep the high standard of safety and matbe even increase the standard toinsure firefighter safety.

Thank You

Robert Bartholomay