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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

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Hopefully, the current review process for updating 42 CFR Part 84 will provide an opportunity to change the approval process for SCBA (Self-Contained Breathing Apparatus) used for structural firefighting and other applications involving potential IDLH atmospheres (Immediately Dangerous to Life and Health). For nearly ten years I have served as the SCBA manager for the Eagan Fire Department and maintained certification as a repair technician for SCBA. My experience includes overhaul and service of air cylinders used with several models of SCBA.

Even though all manufacturers of SCBA currently utilize air cylinders manufactured by outside vendors, the NIOSH approval for SCBA systems covers complete systems. A separate cylinder approval issued to the actual producer of air cylinders should be allowed, rather than the entity that uses the air cylinders as a component. This is especially true when one considers the fact that makers of SCBA typically offer more than one option for the brand of cylinder. In other words they obtain the cylinder, add their logo to it and market it as their own. I can take two cylinders manufactured by the same company and to the same DOT specifications, but each with a logo of a different company. Under the current NIOSH approval system for SCBA I can not use cylinder A with assembly B, because it has a different logo on it. It is no different than requiring only bottles of one color versus another color when all the materials and manufacturing processes are identical.

It is my belief that the Fire Service, and other users of SCBA, would be better served by changing 42 CFR Part 84 to require NIOSH evaluate SCBA assemblies separately from the air cylinder. Generally speaking, cylinders are generic, with no proprietary designs required by the SCBA manufacturer. To be considered for use in an SCBA application, the cylinders must be DOT-CFFC approved. All SCBA cylinders are subject to tests and evaluations performed by resident, third-party inspectors during the manufacturing process. The inspector's mark is permanently affixed to the cylinder at the time of satisfactory completion of the manufacturing process.

Continuing to require the end user to only use only DOT-CFFC approved air cylinders makes good safety sense. However, it does not make sense not being able to purchase directly from

the cylinder manufacturer. OSHA already allows interoperability of cylinders in emergency situations proving the fact that a DOT-approved cylinder will operate safely in virtually any SCBA application.