

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

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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

The current system of certifying SCBA's as full assemblies only is hurting the fire service, The current method forces us to use only one brand of SCBA cylinders while all cylinders will work on our masks. By law, the cylinders must all have the same threads so that they may be interchangeable yet the current certification process does not allow them to be used on a different brand of SCBA. So, in one place you force them to be the same yet you do not allow them to be used on other masks.

The cost of cylinders is very high under the current system. When a new brand of SCBA is purchased we must purchase all new cylinders even when we have many years of service left on the current ones. Due to this extra cost, many departments can't purchase new SCBA's as they can only afford the masks, not all the bottles.

We need your help with this. This is something that can't be left to the manufacturers or to NFPA which is heavily influenced by the manufacturers.