

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

---

**From:** dgreening@nwfd.org  
**Sent:** Tuesday, March 29, 2011 5:48 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

Name  
Lt. Daren Greening

Organization  
North Washington Fire Department

Email  
[dgreening@nwfd.org](mailto:dgreening@nwfd.org)

Address  
8055 Washington  
Denver, CO 80229  
USA

Comments  
March 29, 2011

NIOSH Committee referencing 42 CFR Part 84 Docket #221

I am writing this request to you as both a user of the supplied air cylinders with in fire departments for the last 27 years and a vendor of both supplied air breathing systems (Dräger) and replacement cylinders themselves (SCI). From the fire service end of the business I have been involved in the changeover of air systems four different times thus utilizing five different types of cylinders. Each time the systems were changed required a complete new stock of cylinders including one change where the manufacture of air systems changed but the cylinders used carried the same DOT number, was the same size and was made by the same cylinder manufacture, the only difference was the brand name stamped on the outside. With the economy being what it is and the budgets of fire departments becoming tighter and tighter the ability of a department being able to shop for the best product to match their need becomes more and more of a necessity. During the last change of air systems which was only an upgrade with the same manufacture we were required to reduce the number of extra cylinders or department has because of the increased cost. This has been a common thread among departments for some time now and continues to grow. Manufactures are now utilizing the practice of lowest bid when selecting the supplier of their cylinders which in turn transmits to the firefighter who relies on that cylinder without allowing the option of increasing in size, construction or life expectancy. By allowing cylinders from different manufactures to be utilized on any air systems supplied in today's market fire departments can manage their funds to provide the newest and most up to date systems and accessories. Many departments are attempting to follow the directives set forth by the Department of Homeland Security yet with the current requirement relating to certification of a air system utilizing a different manufactures cylinder other than the one it was supplied with voids any warranties that might be on the system. As the air system provider does not manufacture the cylinder or certify it I would like to see the option be made available to departments to purchase DOT certified and registered cylinders for use as this is how they are truly classified.

Thank you for your time and consideration in this matter,

Lt. Daren Greening  
North Washington Fire Department  
Denver, CO 80229