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

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Sent:

Wednesday, March 30, 2011 11:51 AM

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

I feel that if the SCBA cylinders in question meet any of the NIOSH certifications to allow use with different breathing apparatus, approval should be granted. The manufacturers, their suppliers, and governing bodies are holding the end users hostage by "selective" replacements, therefore padding the pocket of everyone involved in selling the product. If a company like SCI can manufacture a replacement product meeting all of the requirements for their uses, and provide that product at a lower price, it will be easier on smaller departments to purchase their needed replacements. It is to the point that the "extras" thrown in on regulating everything from new apparatus to SCBA to PPE only make money for the provider, costing us more and more. Certain striping, certain lighting packages, certain cylinders.... let the end user make some purchases that are easier on the wallet.