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

From: Sent:

Mark Boyle [mboyle@kovatch.com] Thursday, March 31, 2011 9:55 AM

To: Cc: NIOSH Docket Office (CDC) 'smmoyerfire@dejazzd.com'

Subject:

SCBA Cylinders

As a former Fire Chief, I truly believe that this standard needs to be changed. The manufacturers of these SCBA's are holding the fire service hostage by forcing them to purchase all SCBA cylinders from the OEM. I have been involved with the purchase and repair of SCBA for 25+ years, and never once did the SCBA service tech ask me to return the cylinder along with the breathing apparatus to the service center for repair work or warranty, so in essence they have no idea who's cylinder is being used in the field, but if you are using non name brand cylinders, you are being penalized as having a non NIOSH compliant SCBA.

There have been several incidents during my career that have mutual aid companies responding to a common incident where SCBA cylinders were re-filled and used on different brand SCBA without any incidents.

I truly believe that this NIOSH standard should be lifted and open the door to cylinder manufacturers to begin selling cylinders at a much lower cost to the fire service. Look at this from the side of the volunteer fire service where money is extremely tight. If a Fire Chief could purchase a cylinder for \$300-\$400 less than the name brand cylinder, he would be able to purchase more cylinders or even additional SCBA's for the money which he has available, thus providing new or additional breathing apparatus to his responding firefighters. After all, what are we in the business to do, save lives and properties, or add to the profits of equipment manufacturers who already are taking advantage of the emergency service responders.

Respectfully,

Mark A. Boyle

Retired Fire Chief East End Fire Company Tamaqua, PA

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