

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

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**From:** radkep@ados.net  
**Sent:** Wednesday, March 30, 2011 9:15 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

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Comments

Dear NIOSH Administrator, About four years ago I began a fact finding quest for my small volunteer fire department to make recommendations for the replacement of our composite SCBA cylinders which were close to 15 year expiration. I discovered that (Luxfor and SCI) are OEM manufacturers of cylinders and found tanks offered which had correct engineering specifications for our SCBA's.

I was not successful at explaining to our board that the rules which certify the SCBA's as an assembly were not a mandate, they became very hung up on the idea though that SCBA's are an assembly and must remain so.

The outcome was that the department purchased new SCBA's spending over \$70,000 where I could have purchased compatible non-packaged replacement cylinders for about \$12,000

It would be a big benefit to us to be able to buy a few aftermarket cylinders each year, so that the 15 year expiration on the tanks does not occur all in the same year, to allow us to spread tank replacement costs out over multiple years.

I am not sure if you write the rules on fittings, I want to suggest it would be wise to have a industry standard single threaded fitting profile so that there would be compatibility at mutual aid (a Scott tank for example could be substituted on an MSA pack).

Thank You, Paul Radke, Volunteer fireman SIFD