

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

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**From:** richstannard@aol.com  
**Sent:** Tuesday, March 29, 2011 10:36 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  
richard stannard

Organization  
pavilion township fire department

Email  
[richstannard@aol.com](mailto:richstannard@aol.com)

Address  
6037 clovermeadows  
scotts, mi 49088  
united states

Comments

Testing process for entire SCBA units, is not allowing for a test for the cylinder alone. Cylinder manufacturers such as SCI manufacture the SCBA manufacturers cylinder used in the test of the SCBA unit already. These manufacturers than sell cylinders that meet DOT approval but not NIOSH approval placing a road block to all involved buy forcing municipalities to purchase replacement cylinders from the SCBA manufacture at a significant higher price because the cylinder does not say Scott or MSA, You can look back at old photos of complete SCBA units complete with the cylinder on it, and you can see the names of the manufactures on them with a DOT number.

Please change your current process. With these trying times and the over stretched municipality budgets, this one action would greatly help all involved in the fire service. I am not asking for you to skimp on my safety. I am asking you to test the cylinders from the cylinder manufacturers separate from the SCBA unit.

Thank you