

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

From: tcurtis@rentonwa.gov
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Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 221 - NIOSH Regulatory Agenda for updating 42 CFR Part 84 Comments

Name

Lt. Tom Curtis

Organization

Renton Fire and Emergency Services

Email

tcurtis@rentonwa.gov

Address

1900 Lind Ave. SW
Renton, WA 98055
USA

Comments

NIOSH needs to stop testing and listing SCBA air packs as a complete unit. When the cylinder is already regulated the DOT it is redundant and limits choices of the end user. These cylinders are not altered or tested in a significant way by the SCBA manufacturer. The status of having the complete unit being purchased only through the manufacturer only raised the price for the end user and limits the availability to firefighters. This limited availability causes reduced safety due to a reluctance to change cylinders or purchase new or different SCBA packs.