

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

From: Steve@capitaltechrescue.com
Sent: Thursday, March 31, 2011 8:36 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 am strongly in favor of NIOSH, and the work they have done over the years with fire service SCBA's. There are several examples of third party equipment that I believe NIOSH should consider allowing the use of without violating the respirators niosh certifications.

The first example is escape belts or escape systems that can be removed from the frame of the SCBA without having any impact on the actual respiratory components of the SCBA. Currently there are many great escape systems on the market and are evolving at a rate faster than what Manufacturers are willing to have retested. This limits our members from possibly selecting the safest and best systems available at the time to the one that the manufacturer is currently offering. This is currently true with one SCBA company who is using a first generation descent device while the manufacturer of the descender has a second generation device that is being used in non SCBA escape systems. They are only shipping the first generation device to the SCBA company who is hesitant to change it out because they will need to run through all the testing again.

The second example is allowing the use of approved and/or compliant cylinders from cylinder companies instead of SCBA companies exclusively.Â Firstly, a company such as SCI makes quality cylinders and has previously made SCOTT's cylinders. Secondly, in today's economic times fire departments need to stretch their dollar as far as possible.Â To spend \$1,300 on a SCOTT cylinder when I can buy an equal or better cylinder from SCI for \$600 is crazy.Â A price disparity such as this demands change!

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Please make every consideration to modify this policy/regulation/rule.Â Â Your immediately action in this matter is greatly appreciated...