

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

From: Mulligan, Mike [mmulligan@avfd.com]
Sent: Thursday, March 31, 2011 9:27 AM
To: NIOSH Docket Office (CDC)
Subject: Docket #221

As the Assistant Chief of Fire/Rescue at the Atascocita Volunteer Fire Department in Humble, TX, I am responsible for both the safety of the firefighting force and adherence to budgetary constraints. Obviously my first priority is the safety of my volunteers.

We use SCOTT Air Packs (SCBA) exclusively and have purchased SCOTT replacement bottles when needed. I have noticed that, in the past, some of the bottles were manufactured by a different company than the one that is currently making the bottles. I find this interesting as the basis for opposition to this requested rule change is that the bottle is integral to the SCBA unit and must be manufactured only by a single source supplier purchased through the SCBA manufacturer.

How can these old (less than 10 years) bottles be unsafe, if they were purchased with the harness and still have NIOSH approved useful life left? More importantly, what happens if the manufacturer gets a better deal from another bottle manufacturer next year and now their bottle is the new "component" required to make the SCBA safe? Does this mean that all of the harnesses I purchased with the old bottles have to be replaced as well, because they are not compatible with the new bottle? Or will I have to replace all of the complete units I just purchased and took delivery of last month because next week the new bottle contract at SCOTT starts with ABC bottle company and now these three week old units are not compatible any more?

What engineering changes are being made to the ensemble that make the current bottle or the next bottle so much safer or better? The answer is NONE! The only component that matters in the bottle portion of the SCBA is the valve, which is interchangeable between bottles.

Please don't put me or my department in a position to be penalized for trying to be good stewards with our taxpayer's money, by looking for safe alternatives to the outrageous prices being demanded for these bottles.

Thanks.

Mike Mulligan
Assistant Chief - Fire/Rescue
C: 281-731-6896