January 6, 2015

Dear Valued Customer,

As the leading manufacturer of SCBA in the fire service market, Scott Safety strives to keep you informed about current industry and safety equipment issues and challenges. One such issue that continues to present itself involves the purchase of aftermarket cylinders that are not supplied by the manufacturer of the Self-Contained Breathing Apparatus (SCBA).

If your department is considering purchasing aftermarket cylinders, please be aware of the following facts:

A) **NIOSH approvals are applied for, and granted for, an entire respiratory system such as an SCBA (including the cylinder) to the respirator manufacturer and not for the individual components.** It is stated in the Title 42 Code of Federal Regulations (CFR), Part 84 that an SCBA is the sum of its components:

Sec. 84.71 Self-Contained Breathing Apparatus

(a) Each self-contained breathing apparatus described in Sec. 84.70 shall, where its design requires, contain the following component parts:
1. Facepiece or mouthpiece, and noseclip;
2. *Respirable breathing gas container (Compressed Air Cylinder)*;
3. Supply of respirable breathing gas;
4. Gas pressure or liquid level gauges;
5. Timer;
6. Remaining service life indicator or warning device;
7. Hand-opened valves;
8. Breathing bag;
9. Safety relieve valve or safety relief system; and
10. Harness

A) NIOSH approval is required in order to be compliant to the NFPA 1981 standard.

B) The use of a non-approved cylinder on a NIOSH approved and NFPA compliant SCBA respirator will void any and all approvals associated with the respirator.

C) The use of unapproved products exposes your department to the possibility of future liability claims should an incident involving a SCBA wearer occur.

D) An aftermarket cylinder that is DOT approved does not equate to meeting the respirator manufacturer's quality controls, NIOSH approvals and NFPA compliancy when used with a SCBA.
To reinforce their position on the use of aftermarket component parts, NIOSH released a User Notice which can be found at:

In their notice, NIOSH advises that "replacing NIOSH-approved respirator parts, components, and accessories with non NIOSH-approved parts manufactured by another company voids the NIOSH approval." The notice further states that "using a modified configuration may also void the manufacturer's product warranty."

As of the date of this letter, the only cylinder supplier for Scott Safety is Luxfer. The cylinders currently being offered by other manufacturers are not approved with the Scott SCBA respirator. Other cylinder manufacturers may state that the cylinder being replaced by the department was originally manufactured by them and their new cylinder is a suitable replacement. There was a time when Scott did use certain third parties other than Luxfer and the SCBA respirator carried NIOSH and NFPA approvals. However, this is not the case today.

It is understandable that in today's economic environment, departments are carefully watching budgets. It is also important for the departments to have all of the facts prior to making critical purchase decisions related to life safety equipment. Scott Safety has heard from multiple customers who purchased aftermarket cylinders and who have expressed great regret in their decision when they learned that their cylinder purchase caused their SCBA respirators to be out of compliance.

Scott Safety continuously works with its suppliers to minimize the prices of our SCBA assemblies. However, there are significant costs associated with maintaining NIOSH approvals and NFPA compliancy on the complete SCBA respirators. A portion of the costs go toward the testing that is required prior to submitting to the approval agencies. Additional costs are used for the multiple inspections and testing that is a component of a rigorous quality program that allows Scott Safety to maintain the best warranty in the industry.

In an effort to minimize the economic impact on fire departments, Scott Safety has introduced a 30-year life cylinder. The introduction of the 30-year life cylinder reinforces the commitment of Scott Safety to provide our customers with a selection of products that allows them to select the option that provides the best value across the life of their product.

If you have any further questions regarding the purchase of aftermarket cylinders, please feel free to consult your local Scott Regional Sales Manager or Field Service Specialist. Other resources available to your department include your insurance company, your attorney (if self-insured), or workman’s compensation department.
Thank you for your continued interest, support and confidence in Scott Safety products.

Sincerely,

[Signature]

Jason Cannon
Product Line Manager, Air-Pak SCBA