



Oregon
Theodore R. Kulongoski, Governor

Department of Consumer and Business Services
Oregon Occupational Safety & Health Division (OR-OSHA)
350 Winter Street NE, Room 430
P.O. Box 14480
Salem, OR 97309-0405
Phone: (503) 378-3272
Toll Free: 1-800-922-2689
Fax: (503) 947-7461
www.orosha.org

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Arlen Blenkush
Training Officer/Paramedic
Jackson County Fire District No. 3
8333 Agate Rd.
White City, OR 97503
(541) 826-7100

Dear Mr. Blenkush :

You asked a question on the issue of fall protection for "real-time" simulated fire service training on elevated surfaces. Reportedly *“ training officers throughout the state have declared their vertical ventilation props off limits because they do not provide fall protection. Some fire departments have built fall protection into their props, but it makes them very unrealistic and firefighters gain a false sense of security that they are not afforded during an actual fire emergency.”*

When fire service employers are conducting fire fighter training they do not need to provide fall protection during the actual simulation of the task when the trainee is training on a surface over 10 feet.

The reasoning is the same as chainsaw use during fire training. The July 2, 2004 interoffice memorandum titled “Leg Protection for Fire Fighters Using Chain Saws” <http://www.cbs.state.or.us/osha/interps/2004/cslegprotect4fire.pdf> points out that the fire fighters’ standard was written with the need for quick action, coupled with a high degree of training. It would be expected that all fire fighters using a chain saw would receive standardized training (supported by a written training package and documentation), and would be competent in their ability to safely use a chain saw.

Fall protection would be no different than the rational used in the chainsaw interpretation. Training would need to be detailed, standardized and progressive in allowing those employees that are not initially comfortable working from heights to adjust gradually. Personnel would need fall protection under certain conditions such as re-setting roof props. Depending on a particular department resources and whether the training is accomplished on an acquired structure or at a training facility, the department may have the ability to protect from falls by other means that do no detract from the reality based training. During a "real-time" simulated evolution, fall protection would not be required.

For further information contact us at (503) 378-3272. You are also invited to see the OR-OSHA pages on the Internet at www.orosha.org.

Sincerely,
Peggy A. Munsell, Manager
Standards & Technical Resources