



# Oregon

Theodore R. Kulongoski, Governor

## Department of Consumer and Business Services

Oregon Occupational Safety & Health Division (OR-OSHA)

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September 27, 1996

Elmer Green  
Northwest Natural Gas Company  
220 NW 2nd Ave  
Portland OR 97209-3991

Dear Mr. Green:

This is in response to your August 28, 1996 letter in which you ask for a rule interpretation on OR - OSHA'S position regarding the protective clothing and training required when closing gas valves at a fire scene under both the Fire Fighters (437-02-182) and Hazardous Waste standards (1910.120).

When gas company employees respond to a gas leak at a fire scene they are considered to be skilled support personnel to the fire department and under the direction and control of the incident commander in charge of the scene. The person performing the gas control must be briefed by the incident commander before attempting to stop the leak. The briefing must cover the hazards involved at the scene, instructions on proper personal protective equipment to use and what duties are to be performed. This person would not have to be in turnouts or other fire department protective gear if agreed upon by both parties that the person's clothing is adequate protection for both the work task and potential hazards at the fire scene.

When gas company personnel respond to a gas leak at a hazardous waste scene they are again considered to be skilled support personnel under the control of the incident commander at the scene. The incident commander must, in conjunction with the skilled person, be briefed on what precautions must be taken and what safety equipment will be needed to enter the hazard zone to control the leak.

As to the level of training for gas company personnel under the hazardous waste standards they are considered to be skilled professionals with equivalent training for their limited work task and must only be briefed as to the hazards of the scene and what proper personal protective equipment may be needed.

If we can be of further assistance to you, please call [Jerry Hoard](mailto:jerry.hoard@orosha.org) at 378-3272.

Sincerely,

Marilyn K. Schuster, Manager  
Standards & Technical Resources Section  
Oregon Occupational Safety & Health Division