October 6, 1997

Darin Welburn, Division Chief Jackson County Fire District No. 5 716 South Pacific Highway Talent, Oregon 97540

Dear Chief Welburn:

This letter is in response to your September 17, 1997 letter questioning whether a duty uniform comprised of polyester blends is safe and acceptable to be worn under protective clothing during fire suppression activities.

While OAR437-02, Subdivision L includes requirements for protective clothing, it does not clearly address the subject of duty uniforms or clothing worn under protective clothing. OAR437-02-182(9)(c) could be interpreted to touch upon the subject, in that it states that in situations other than structural fire fighting, the employer shall ensure that protective clothing **appropriate** for the known hazards of that particular emergency operation is worn. This standard could apply to situations and activities when the use of station uniforms is acceptable in lieu of turnouts or other protective equipment. The standard, though, does not address the potential for injury when fabrics with poor thermal stability or poor flame resistant qualities are worn beneath protective clothing.

One source of information which may be helpful to you is NFPA 1500, 1992 edition, "Fire Department Occupational Safety and Health Program". Whether NFPA 1500 requirements are mandatory or not for your district, the following information appears to answer the question that you ask in your letter:

5-1.6 Where station/work uniforms are worn by members, such station/work uniforms shall meet the requirements of NFPA 1975, Standard on Station/Work Uniforms for Fire Fighters.

5-1.7 While on duty, members shall avoid wearing any clothing that is considered unsafe due to poor thermal stability or poor flame resistant characteristics of the fabric(s).

5-2.7 The fire department shall assure that all members who engage in fire fighting operations are aware of the flammability and thermal stability characteristics of various types of fabrics used in clothing. Fire fighters shall avoid wearing clothing under protective garments that is considered unsafe due to poor thermal stability or poor flame resistant characteristics and that could itself cause injury to the fire fighter despite the appropriate protective garments worn over such clothing.

For further information or assistance please contact Mike Mitchell at 378-3272. You are also invited to see the OR-OSHA pages on the Internet at www.cbs.state.or.us/external/osha/index.html.

Sincerely,

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

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