



## **INTEROFFICE MEMORANDUM**

### **Oregon Occupational Safety & Health Division**

February 26, 2003

**TO:** All OSHA

**FROM:** Marilyn Schuster, Manager of Standards & Technical Services

**SUBJECT:** Fire Code Interpretations

**Question #1.** What Personal Protective Equipment are firefighters required to wear to meet the requirements of the 2 in 2 out rule in 1910.134(g)(3) & (4) with regards to the personnel performing as the 2 out crew while standing by outside.

The concern within the firefighting industry and among us is in 1910.134(g)(3)(vi) the term **EQUIPPED** is used. Does this mean for firefighters stationed outside as standby personnel to have donned and be wearing full turnouts or full turnouts and SCBA harness assembly in a “ready to go” state for immediate entry? Some agencies believe the standby crew only has to have the equipment available on-site and ready to don for entry.

We have read letters of interpretation from Fed-OSHA, the preamble to the respirator rule and NFPA standards but, have not found a definite conclusion as to what PPE the 2 out stand-by crew are required to wear to be compliant with the rule.

If **EQUIPPED** is determined that equipment be available on-site, the fire industry is asking what time frame would be acceptable for donning of equipment and entry for rescue of personnel?

**Answer #1.** The “two-in/two-out” rule does not take effect until interior structural fire fighting begins. Thus, the fire fighters located in the outside stand-by mode are essentially part of the attack team and are expected to be protected in the same fashion as the fire fighters inside attacking the fire. OAR437-002-0182(11)(e) requires foot, leg, hand, body, eye, face and head protection. OAR437-002-0182(12) - (16) cover the requirements for turnouts, helmets, hoods, gloves, footwear, and eye and face protection. OAR437-002-0182(17) is the reference to move from Subdivision L to 1910.134 for respiratory protection. 1910.134(g)(3)(iii) requires fire fighters located outside the IDLH atmosphere be trained and equipped to provide **effective** emergency rescue. Thus, in order to provide “effective” emergency rescue, the fire fighters in the outside stand-by mode must be prepared to respond immediately.

1910.134(g)(3)(vi)(A) identifies the required respiratory equipment for the fire fighters in the outside stand-by mode. The standard is performance-based, leaving the choice of retrieval equipment to the user. The concept of “performance-based” is very important to understand, especially when deciding what is meant by “equipped”. As already stated, 1910.134(g)(3)(iii) requires employees located in the outside stand-by mode to be trained and equipped to provide “effective” emergency rescue. The word “effective” puts the burden for being prepared to respond immediately (if needed) on those in the outside stand-by mode. Anything less than having turnouts on and buttoned up, SCBA tanks and harness assemblies on and secured, masks and helmets available for immediate donning, and everything ready to go, does not comply with the intent of the standard to provide “effective” emergency rescue. This idea is supported by the Note 1 to paragraph (g), which says that one of the two individuals located in the outside stand-by mode may be assigned an additional role, so long as that individual may assist in rescue activities without jeopardizing the safety or health of any fire fighter working at the incident. The Federal Register addresses this issue and explains that other assignments involving critical tasks are not allowed if by abandoning such critical tasks to perform a rescue the safety and health of any other fire fighter is jeopardized. This issue would not have even been addressed as strongly as it was had there not been the intention that rescue activities begin immediately when needed, not as soon as coats and SCBAs could be donned.

**Question #2.** Separate water supplies are required in 437-002-0182(10)(c)(B)(iv) for interior attack lines and back-up lines during training exercises. Is this enforceable for emergency incidents? One reference requiring the use of a 1 2 inch or larger fire attack hose line on a “working fire” is in a Federal Interpretation dated 5/01/1995: Response to IDLH or Potential IDLH atmospheres.

OAR437-002-0182(10)(c)(B)(iv) is applicable only to “live fire training”. The key word is “training” This rule does not apply to emergency incidents that are not part of training.