

November 12, 2002

Revised: April 15, 2005

Revised: July 21, 2005

Virgil Hall
2124 SE Oak Street
Portland, Oregon 97214

Dear Mr. Hall:

This letter is in response to your questions regarding the “two-in/two-out rule.” The requirements in 1910.134(g)(4), combined with those in 1910.134(g)(3) require that whenever a team of fire fighters enters an IDLH atmosphere, at least two fire fighters must stand by, outside the IDLH atmosphere, properly equipped and ready to respond immediately should an emergency rescue be needed. This requirement may be suspended when all the conditions of the “Note”, following OAR437-002-0182(5)(d), Oregon Rules for Fire Fighters, are met. The first “note” for 1910.134(g), which is intended to provide guidance in complying with the intent of the rule, states that one of the individuals located outside the IDLH atmosphere may be assigned another role, such as incident commander or safety officer, so long as that person is able to assist in the performance of rescue activities without jeopardizing the health or safety of another fire fighter at the incident. 1910.134(g)(3)(ii) requires maintaining visual, voice, or signal line communication between the fire fighters inside the IDLH atmosphere and those outside. Anyone in the outside, stand-by mode may monitor the safety of the fire fighters inside the IDLH, as long as the intent of the standard is complied with. The federal preamble discusses these issues at length, and clearly states that the requirements of the “two-in/two-out rule” are not intended to establish staffing requirements. The purpose of the standard is to specify how many fire fighters must be present before an interior structural fire is attacked.

In summary, one of the fire fighters in the outside, stand-by mode may perform other duties so long as the safety of those inside the structure (in the IDLH atmosphere) is continuously monitored, and both outside, stand-by fire fighters are prepared to respond immediately should a rescue be needed. Stand-by personnel performing secondary tasks must be able to immediately abandon them without creating a hazard for other fire fighters at the scene. **In the original letter, Oregon OSHA’s position was that** the assignment of apparatus operator duties to one of the stand-by fire fighters would not be allowed since abandoning that task could create a hazard for others. **The issue of assigning an apparatus operator to one of the outside, stand-by fire fighter positions was re-examined by the OR-OSHA Fire Fighters Advisory Committee. The consensus of the Committee, and (now) Oregon OSHA’s position is the assignment of apparatus duties to one of the stand-by fire fighters is allowed as soon as the pumper is operating properly, with water flowing from a reliable and adequate source.** The assignment of incident commander to one of the stand-by fire

fighters is allowed. Since the “two-in/two-out rule” does not take effect until fire fighters begin to attack the fire and perform interior structural fire fighting, any investigation or “sizing up” of the situation, or rescues do not require two-member teams inside and outside the structure.

For further information please contact Mike Mitchell at (503) 947-7450. You are also invited to see the OR-OSHA pages on the Internet at the above address.

Sincerely,

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