

January 25, 1999

Steve Morris, Vice President  
Sea-Western Inc.  
P. O. Box 51  
Kirkland, Washington 98083

Dear Mr. Morris:

This letter is in response to your letter in which you ask for clarification of Personal Alert Safety System devices (PASS), required by OAR437-002-0182(20).

It was an oversight on the part of OR-OSHA that the edition of the NFPA that is referred to in the standard was not printed. The OR-OSHA Fire Fighters Advisory Committee used NFPA 1982 (1993 Edition) in developing OAR437-002-0182(20). Reference in the standard to NFPA 1982 should include (1993 Edition).

At the present time, and at least until the next revision of OAR437-002-0182, Oregon Rules For Fire Fighters, the standard will continue to refer to NFPA 1982 (1993 Edition). This means that PASS devices will not have to be upgraded to comply with newer editions of the NFPA. At the time of adoption of OAR437-002-182(20), both OR-OSHA and the advisory committee believed that the PASS devices currently in use provided adequate protection. It was also important that all fire departments in Oregon be able to acquire PASS devices by January 2, 2000. If upgrading to the recently adopted NFPA (1998 Edition) was required, then some departments probably would not be able to meet the standard due to the increased cost. It's important to remember that OR-OSHA's rules are minimum standards and that if a fire department chooses to voluntarily upgrade their PASS to meet a newer edition of NFPA which provides a higher level of protection, while still complying with the minimum required standards, that's acceptable.

For further information contact Mike Mitchell at 378-3272. 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 Section  
Oregon Occupational Safety & Health Division