INTEROFFICE MEMORANDUM
Oregon Occupational Safety & Health Division

April 22, 2005

TO: All OR-OSHA
FROM: Marilyn K. Schuster, Manager
Standards & Technical Resources

SUBJECT: Correct PPE Standards for Fire Fighters

Question: When fire fighters are involved in activities or tasks (often at the station) that are not directly related to fighting fires (such as building or yard maintenance, equipment repair and upkeep, cooking or cleaning), do the PPE rules in 2/L, or in 2/I apply?

Answer: Tasks performed by fire fighters that are directly related to fighting fires (including training to fight fires), or directly related to responding to other emergencies (such as automobile accidents, chemical spills, medical emergencies, or rescues) are covered by the PPE rules in 2/L (OAR437-002-0182 (11), (12), (13), (14), (15), and (16)). Other tasks performed by fire fighters that are not directly related to emergency responses (such as yard and maintenance work at the station, servicing vehicles, maintaining equipment, conducting inspections, or taking part in public service projects) are covered by the PPE rules in 2/I.

OAR 437-002-0182 serves as a vertical standard for any and all activities, operations and equipment of employers and employees involved in providing fire protection services and other emergency first responses and related activities. If a task is addressed by a rule in 2/L, then the general PPE rule 2/I is not used. Otherwise, 2/I is used. The common factor addressed by all the PPE rules in OAR 437-002-0182 (sections 11, 12, 13, 14, 15, and 16) is fire scenes and emergency incidents. An assessment of hazards to eyes, face, head, feet, and hands (1910.132(d)) is required for non-emergency activities covered by 2/I. Activities covered by 2/L do not need to be included in the assessment.