

**Oregon OSHA**  
**Fire Services Advisory Committee (FSAC)**  
**March 13, 2024 (2:00 p.m.)**  
**OR-OSHA Salem Field Office, Zoom meeting**

**Attendees**

Brian Smith, Corey Stengel, Dave McLaughlin, Devon Brown, Forest Chambers, Genoa Ingram, Heather Goodrich, Jason Jantzi, Jeff Williams, Kate Ryan, Mark Jennings, Matt Lass, Omar Lopez, Ray Dirling, Renee Stapleton, Rocky Hanes, Theodore Bunch, Tom Bozicevic

**Agenda**

- Introductions
- MSA G1 SCBA Inspection Frequency
- Non-entry firefighting rulemaking update
- Overview of federal OSHA's proposed Emergency Response Standard (for more information, visit federal OSHA's Emergency Response Rulemaking webpage: <https://www.osha.gov/emergency-response/rulemaking>)
- 2024 FSAC meeting dates: 2–4 p.m. on June 12, Sept. 11, and Dec. 11

**Discussion**

- Introductions were conducted.
  
- MSA G1 SCBA Inspection Frequency  
MSA is working on a proposed update to their G1 Instruction Manual for inspecting the units, that will be submitted to NIOSH for review and approval.

Comments/Questions

- Stations may not have workers in there on a daily or even weekly basis. They updated it to weekly frequency.
- Concern—Oregon OSHA rules say monthly inspections are required and to follow manufacturer specifications, which says daily inspection. We will be submitting this change to NIOSH for their review and approval of a language change to say "at the beginning of each duty period." There is a discussion on what a duty period is.
- In the NFPA, there is not a clear definition of duty period especially for volunteer.
- The firefighting rule requires employers to develop and implement a respiratory protection program in accordance with Division 2/I, 1910.134, Respiratory Protection. Inspections have become more complicated over the time since the rule was written referencing the manufacturer.
- Member will report back to the committee on this topic.

- Non-entry firefighting rulemaking update

#### Comments/Questions

- This rulemaking will be placed on hold. We had a meeting with Senator Findley. He wanted to have an alternate version of training for "frontier" firefighting. A question is, how can you look at training and not look at equipment? The discussion was on the ability to have a non-entry firefighter.
  - Member: If we have exterior-only firefighters, ISO would rate them at the lowest level of 10 and say they have no fire protection which equates to no homeowner's insurance. We thought it would be rated at 9W and that was not the case in ISO's eye. We felt it best to shelve this topic for now for further discussion.
  - A. There is a new concern that these changes would make Oregon OSHA rules not as effective as federal OSHA proposed rules if adopted.
- Overview of federal OSHA's proposed Emergency Response Standard (for more information, visit federal OSHA's Emergency Response Rulemaking webpage: <https://www.osha.gov/emergency-response/rulemaking>)
    - Oregon OSHA had a meeting with the governor on March 12 and we will put together a response. We have posted a survey on our Fire Services Advisory Committee webpage: <https://osha.oregon.gov/rules/advisory/ffac/Pages/default.aspx>. The survey results will be put in a letter to federal OSHA. There will also be a request for comments. Comments can go outside the questions asked on this document. May 6 is the deadline to federal OSHA for comments.
    - Federal OSHA has no jurisdiction over public employees. We think there are fewer than five private fire services companies in Oregon.
    - We recognize that this topic has many moving parts.

#### Comments/Questions

- Q. For the private companies who come in, does Oregon OSHA have jurisdiction over those from out of state?
- A. Yes, on the duties that they perform in Oregon. Unless they are public employees, then neither Oregon OSHA nor federal OSHA have jurisdiction.
- Comment: There are approximately 3700 career firefighters in Oregon. There is a general number of just over 300 entities in Oregon.
- The Pre-Incident Plan (PIP) would have to be reviewed annually.
- Comment: This requires fire services to perform an assessment of all natural resources too – rivers, creeks, mountains, cliffs, caves.
- Comment: The PIP can cost our unit tens of thousands of dollars. Not all companies could afford those costs.
- Comment: Our PIP cost \$100K with an outside consultant. And once it is done it is already outdated.

- Q. For medical and physical requirements under the proposed rule, is an action level of 15 exposures to combustion products within a year to increase medical surveillance too high?
  - Q. What is the definition of exposure and who determines an exposure?
  - Comment. The focal point is the combustion event. Meant to identify cancer early but it is not stopping it.
  - Q. Should it be a time standard (in months/years) rather than exposure standard?
  - Comment. This is for any exposure, not just acute exposures.
  - Comment. There are some rule that overlap. Exposure to heat rule exempts when in the emergency setting itself but there are other times when workers would be exposed to heat.
  - A. We see some good things in this proposed rule. The challenge is that it is not necessarily specific to Oregon's needs.
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- 2024 FSAC meeting dates: June 12, Sept. 11, and Dec. 11. Send agenda items to Tom Bozicevic at [Tom.BOZICEVIC@dcbs.oregon.gov](mailto:Tom.BOZICEVIC@dcbs.oregon.gov).
  - Regional safety conference in September in Bend. Looking for pertinent topics and speakers in fire services and other topics to Corey Stengel at [Cory.C.STENGEL@dcbs.oregon.gov](mailto:Cory.C.STENGEL@dcbs.oregon.gov).