



IAFC Comments on OSHA Draft Emergency Response Standard

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Who is the IAFC?

- Represent leadership of America's fire and emergency service.
- Members include:
 - Career fire departments
 - Volunteer fire departments
 - Combination fire departments
 - Federal/Military fire departments
 - Industrial fire brigades
 - EMS departments
 - HazMat teams
 - Wildland firefighters
 - Fire Protection

The Need for Safety Standards

- 2023 - 89 firefighters died from injuries, strokes, aneurysms, and heart attacks while on duty or within 24 hours of the line of duty (NFPA).
- NIOSH conducted research demonstrating that firefighters have a 9% increase in cancer and 14% increase in cancer-related deaths, when compared to the general population.
- WHO's International Agency for Research on Cancer (IARC) classified the occupational exposure of firefighters as "*carcinogenic to humans* (Group 1), on the basis of *sufficient evidence* for cancer in humans."

Incorporation of NFPA Standard by Reference

- Concern about using NFPA standards
 - NFPA standards are on a three-to-five-year review cycle.
 - NFPA standards being consolidated.
- We support the use of the NFPA 1582 standard for physicals.
 - Funding and Implementation issues.
- For wildland firefighting, use standards by the National Wildfire Coordinating Group.

Cost of Compliance

- **Career departments with between 240 and 600 responders predicted an increase in annual budget cost of two to ten percent (2%-10%).** For these groups it is anticipated that certification and infrastructure requirements will be the most significant cost, and compliance with the rules will take anywhere from 3 to 4 years. However, infrastructure updates may require up to 10 years.
- **Career departments with less than 150 responders predicted that compliance with the proposed standard will take 3-5 years and increase their annual budgets at least by five percent (5%).**
- **Smaller departments with fewer than 70 responders will be critically impacted. They anticipate as much as a forty-six percent (46%) increase on annuals budgets and up to 10 years to become fully compliant.**

Applicability to Volunteer Fire Departments

- Concern about Implementation Schedule.
- Concern about Cost of Implementation.
 - Volunteer fire departments have limited budgets and financial base.
- Need to consider FLSA 20% “Bright Line Test” when defining “volunteers.”
- Ask OSHA & State Plan states to consider feasibility of standards for small and volunteer departments
- Equivalent or more effective means to achieve the goals of the draft Emergency Response standard

OSHA Timeline For Implementation

Time Period

- 12 Months

Requirements

- Team Member and Responder Participation
- Reporting Safety & Health Concerns
- Pre-Incident Planning
- Incident Management System
- Emergency Incident Operations
 - Incident Command
 - Establish Protective zones
- Set requirements for Post-Incident Analysis.
- Remove damaged/defective PPE from service.

OSHA Timeline For Implementation

Time Period

- 36 Months

Requirements

- Emergency Response Plans(ERPs) by Workplace Emergency Response Teams (WERT) & Emergency Services Capabilities
- Emergency Response Plans by Emergency Service Organizations (ESO) & Emergency Services Capabilities
- Development of WERT & ESO Risk Management Plans
- Standard Operating Procedures

OSHA Timeline For Implementation

Time Period

- 48 Months

Requirements

- Develop initial and follow-up training requirements.
- Train and provide PPE and other equipment to responders.
- PPE hazard assessment.
- Ensure use of PPE.
- Ensure care & decon of PPE.
- Separate decontaminated PPE.

OSHA Timeline For Implementation

Time Period

- 60 Months

Requirements

- Require detailed training requirements based on NFPA standards.
- Require annual skills checks.
- Responder-provided PPE must meet standards.
- Provide properly fitting PPE and ensure proper use.

OSHA Timeline For Implementation

Time Period

- 84 Months

Requirements

- Develop medical evaluation program and additional screening.
- Develop medical surveillance for exposure to combustion products.
- Develop process to evaluate personnel for fitness for duty annually.
- Develop health & fitness program.
- Establish minimum medical requirements and maintain medical records.
- Provide behavioral health and wellness resources at no cost.

OSHA Timeline For Implementation

Time Period

- 120 Months

Requirements

- Come into compliance with facility requirements.
- Establish requirements for vehicle safety.
 - Inspection/removal from service, driver training, crew safety.
- Program Evaluation
 - Evaluate ERP.

IAFC Comments

- The IAFC's comments are available at:

[IAFC Files Comments in Response to OSHA's Proposed Emergency Response Standard](#)

