

Miller, Diane M. (CDC/NIOSH/EID)

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Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
Subject: 141 - FFUS Comments

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Comments

The Massachusetts Department of Fire Services (DFS) has reviewed the draft NIOSH document, NIOSH ALERT! Preventing Deaths and Injuries of Fire Fighters When Fighting Fire in Unoccupied Structures, NIOSH Docket –141, and we submit the following comments:

DFS agrees with the statistics provided in the report and the case studies illustrate that there is in fact a continuing problem that firefighters “may not fully consider information related to building occupancy before performing offensive operations or entering structures to initiate interior operations” (NIOSH –141). DFS further agrees with your recommendations, particularly the need for:

- SOP/SOG's
- Risk vs. Benefit Training for IC's, Safety Officers, and FF's in these plans
- Establishing an RIT Program, and
- Development of preplans.

DFS would encourage NIOSH to add one additional recommendation:

- Every firefighter responsible for fireground duties be required to attend training on the hazards and considerations of fighting fires in unoccupied structures.

The National Fire Academy should be charged with the task of developing a handoff program for the state training academies to deliver this vital message. The importance of how fire departments determine that a building is unoccupied needs to be reviewed, as most of the time that decision is not made until firefighters arrive on scene and perform a “size up”.

Vacant buildings should be known prior to response, based on preplanning and knowledge of the fire district, just as you have identified in your recommendations.

Massachusetts, as a result of the deadly Worcester Cold Storage fire in December of 1999, took aggressive action with its fire code to require marking and identifying of certain buildings. Buildings determined to be unsafe (especially unsafe in case of fire) are required to be identified through standardized marking on the exterior of the building. Marking informs first responders that:

- Caution is required (if interior operations are decided upon), or
- No entry is to be made, and exterior operations are required.

The regulation was passed and is in both the State Building Code 780 CMR sec 120.5 Posting Structures, and the State Fire Code 527 CMR section

10.13 Marking and Identifying Certain Buildings that are Especially Unsafe in the Case of Fire. The state codes have also adopted the standardized Board up Procedures as recommended by the USFA National Arson Prevention Initiative. Stopping the unauthorized entry into vacant buildings determined to be unsafe will help to prevent fires from starting.

The report specifically identifies and is aimed at unoccupied structures; the background guidelines on the first two pages of the report are as applicable to all structure fires as they are to unoccupied structures. If safety is the goal, then a standard approach to structure fire risk management is needed, with a heightened awareness for the unoccupied structures. DFS believes that this can be a goal of the national and state fire academies, and that programs can be put in place (and efforts made) to require all firefighters and officers up to command level to attend the training.

The decision to make entry for interior attack will continue to pose too high a risk for our fire personnel unless changes to the current practices are made. Only once these changes are adopted will we see a reduction in the number of firefighters killed or injured. The rules of engagement for risk management as outlined in Annex A, section 8.3.2, of NFPA 1500 [NFPA 2007] need to be understood by the line and command officers, and the determination of risk to personnel should be based on the priority to save lives of known victims.

DFS is willing to share our experiences with this issue and the changes that the fire service here in Massachusetts made to help deal with and prevent the unnecessary loss of firefighters lives in unoccupied and vacant buildings.

In conclusion, DFS supports the report and the message that is being sent and would assist in the dissemination of this report once approved. We would gladly endorse any further initiative to develop a training program.

Thank you for the opportunity to provide comment on this important fire service issue.