

**External Peer Reviewer Comments**  
**NIOSH ALERT: Preventing Deaths and Injuries of Fire Fighters When**  
**Fighting Fires in Unoccupied Structures**

**September 30, 2008**

**Reviewer 1:**

**Comment:** Provide updated figures for the annual fire fighter death and injury statistics.

**Comment:** GENERAL COMMENT. It is unclear if the scope of this Alert is intended to be applied to buildings under construction/buildings being deconstructed. While fire events in this scenario may involve on site- construction workers, some of these fires may start when the building is either not occupied or it may involve a scenario where all of the workers have successfully escaped. The August 18, 2007 fire at the Deutsche Bank in New York City that resulted in the two fire fighter fatalities is a case in point.

**Comment:** SECOND PAGE OF INTRO: Fourth bullet in left column. May want to consider a note on evacuation during salvage/overhaul operations after the fire is extinguished.

**Comment:** PAGE 1. The statistics can be updated to reflect 2006 data.

**Comment:** PAGE 2. Revise reference to NFPA as shown. The source of the text is NFPA 1500, not the NFPA 1500 Handbook. Make other text changes as shown (specifics were shown on an annotated copy of the original draft).

**Comment:** PAGE 2. Add code to the first sentence as shown (specifics were shown on an annotated copy of the original draft).

**Comment:** PAGE 3. Update reference to 2008 edition of the two standards as shown. (specifics were shown on an annotated copy of the original draft).

**Comment:** PAGE 7. Consider adding a specific heading or discussion for buildings under construction/under deconstruction.

**Comment:** PAGE 10. Delete reference to NFPA 1500 Handbook. Update editions of NFPA 1521 and NFPA 1501 as shown (specifics were shown on an annotated copy of the original draft).

**Reviewer 2:**

**Comment:** The FLYER: Firefighters (1 recommendation). A key concern should be that the flyer only identifies one (1) action that Firefighters can do to reduce their risks in such structures – and that is to report “conditions & hazards” to others. It suggests nothing regarding the firefighters (employees) personal responsibility for compliance to safety rules, wearing appropriate safety equipment / PPE, the maintenance of tactical crew discipline, the avoidance of hazards or conservative tactics, etc. The subliminal message sent is that firefighters (employees) are not individually responsible for their own safety beyond providing risk information to their superiors – which is clearly not the case and runs counter to most risk reduction initiatives.

**Comment:** The FLYER: Fire Departments (11 recommendations). The category creates an odd combination of suggestions, some addressing F.D. policy others operational tactics, all of which are constructive in and of themselves – but are done in such fashion as to suggest some amorphous organizational (employer) accountability for such policies and practices, ostensibly exclusive of leadership and supervision. This material would probably be better “received” by its intended audience if it were specifically directed to the responsible personnel, i.e. Policy makers, Chief Officers, Company Officers, etc. By example: How does and who in, the FIRE DEPARTMENT is responsible to: “Establish, clearly mark and monitor a collapse zone...” as recommended? Perhaps they are the personnel in the following category, in which they do not suggest such responsibility or accountability in the recommendations.

**Comment:** Incident Commanders & Safety Officers (3 recommendations) Most of the recommendations in the previous section could be arrayed by position / function in this category, which would highlight and reinforce the various INDIVIDUAL’S responsibilities irrespective of the organization.

**Comment:** The “report” covers the same recommendations as the “flyer” in greater detail and with more supporting information which is on point. It would be nice for NIOSH to rely upon USFA’s firefighter death and injury data.

**Comment:** The bulk of information in the “alert” is relevant and appropriate – however the presentation format could be revised to more accurately reflect “individual” responsibility and accountability for such actions.

**Comment:** They need to focus more on the requirement that the firefighter be constantly aware of their surroundings. They need to make that a focus. Whenever you are in a vacant building (of any type) NO RISK is worth their life or injury. It’s just a building.

**Comment:** The need to focus on the requirement for a Rapid Intervention Team being in place anytime people are in a fire. It seems obvious but it’s not mentioned in the current draft.

**Comment:** They speak to the need to be aware of a collapse zone. I would make it stronger somehow. From parking of trucks to setting up staging and rehab, collapse

zones are needed. They also move depending on the spread of the fire and the IC should always be expecting collapse.

**Comment:** Vacant Buildings are an AUTOMATIC red flag to me. If the building is empty, then we should write many of them off! Obviously a house fire or a building you have a chance to catch the fire quickly are ones you should make an attack. On an older vacant or risky vacant property you should marshal all the resources you might need before going in and taking a risk. Those resources might mean calling extra companies, getting an adequate water supply, setting up RIT, getting a full company of personnel and equipment before making the initial attack.

**Comment:** Firefighters MUST learn to be less aggressive. The Charleston firefighters wore it as a badge of courage and paid the price. If the building is vacant, the IC must assess the risk vs. the potential to injure or kill the firefighters.

### **Reviewer 3:**

**Comment:** No concerns at all – looks excellent. The issue MUST continue to be pushed related to FF’s risking their lives where there is no life to save.

### **Reviewer 4:**

**Comment:** General: Throughout, you use “firefighter” where you mean all personnel, including officers. Not likely to get confused (would the FFs leave on an evacuation, and the officers not? – unlikely). But “personnel” is an easy substitute.

**Comment:** Segment on steps for FFs to take (in both long & short alert):

- Suggest adding a bullet to communicate hazardous conditions with fellow crew members as well as up the command chain. This may be the thing to do first if conditions are really bad (in which case it should be obvious to communicate to each other, but...)
- Suggest adding a bullet to notice & report signs indicating whether occupants are in or out. This is everybody’s responsibility.

**Comment:** Bullet on preplanning (in both long & short alert): Changes trusses to “lightweight construction,” or reword to “trusses and other lightweight construction” – to capture things like composite joists.

**Comment:** In the standards section of the longer alert, the IBC is probably worth mentioning, as the much more widely used building code throughout the country.

**Comment:** In the longer alert, in the NFPA 1500 bullet on page 3, change “chapter 4.2” to “section 4.2” for proper NFPA terminology.

**Comment:** In the longer alert, in the size-up bullet on page 7:

- Change “tenants” to “occupants” (a broader term)

- Be sure to get clear reports from neighbors or bystanders – does “save my baby” mean a child or a pet?

**Comment:** In the longer alert, in the type of building bullet on page 7: in portion (1), you should distinguish between FFs and officers—you can have enough FFs but not enough officers.

**Comment:** In the longer alert, in the resources bullet on page 8, change “Emergency Medical Technicians” to “Emergency Medical Personnel” to capture the full range (medics and so on).