



CAPITAL AREA FIRE DISTRICTS ASSOCIATION
BULLETIN



SEPTEMBER 14, 2024

EDITOR - TOM RINALDI tom@rinaldi.com
Serving the fire service community since 2004

CAPITAL SHORTS:

- NEW OSHA INFORMATION IS PRECEDED BY THE **RED ARROW**
- More new OSHA Information this week – public hearing announcement
- **THERE WAS A MISTAKE IN THE RECENT MAILING FOR WORKSHOP '24, THE CORRECT WEBSITE ADDRESS IS CAFDA.NET NOT CAFDA.ORG**
- **Our condolences to the family, friends and fire department members at Midway Fire District on the passing of Life Member Bob Walsh. Bob served as Secretary with the fire district for 29 years and served the fire company in several capacities. May he rest in eternal peace.**

CAFDA NEWS AND OPPORTUNITIES:

WWW.CAFDA.NET

[General Membership Meetings - - In person and Zoom](#)

NEXT DINNER MEETING THURSDAY OCTOBER 10TH, Dinner at 6, meeting starts promptly at 7PM

Printable 24/25 Activity Calendar with much more – See End of Bulletin

Thank you to the Clifton Park – Halfmoon Fire District for allowing us to use their facility for the CAFDA meetings.

[Prelude to the 2025 Elections, Nominations](#)

Nominations will take place at the October 2024 Meeting and Elections will be held at the November 2024 Meeting. It is requested that if you intend to run for President, 1st Vice President, 2nd Vice President or one of the five Director's positions that you submit a letter of intent to the Secretary before or at the October 2024 meeting.

[Planning for CONFERENCE '25 - Lake George](#)

The Education Committee has begun planning for the 2025 Conference to be held in April at the Fort William Henry Conference Center in Lake George. Are there any topics you would like to hear about? Please let John Meehan know at jmeehanafd@gmail.com

[AuSable Forks Fire District Builds New Station](#)



Nice looking facility on a modest budget. Congratulations!!

WORKSHOP '24

SATURDAY, NOVEMBER 2ND

VERDOY FIRE STATION, 988 Troy Schenectady Road, Latham
Per-Attendee Cost is \$20 for Member Districts, \$30 for non-Members

7:00-8:00 Registration & Continental Breakfast
8:00-8:10 Pledge to the Flag & Welcome: Capital Area Association Officers
8:10-9:15 Presentation Topic: Media Relations for Fire Districts Having a Bad Day – Art Hunsinger
9:15-9:30 Networking Break
9:30-10:15 Presentation Topic: OSHA Proposed Standard Update – Dave Denniston
10:30-11:45 Human Resource Challenges for the Volunteer Fire Service – Past Chief, Greg Serio
12:00-2:00 Lunch with the Experts – A panel of experts has been assembled to answer your questions about a broad range of important topics. Joining us will be Attorney, Alyssa Snyder, CPA, Bob Gramuglia, VFBL & LOSAP, Keith Brandstedter, Insurance, Pat Daglio, Apparatus Maintenance & Refurbishing, Marc Mazza.

Everyone is Invited to Attend, not limited to Commissioners
ADVANCE REGISTRATION IS VERY HELPFUL FOR PLANNING PURPOSES
HELP US PLAN - Please Respond by Friday, October 25th, 2024

Return to:
CAFDA
PO Box 242
East Schodack, NY 12063
Or by email to secretary@CAFDA.net

WORKSHOP 24 REGISTRATION FORM AT THIS LINK

<https://cafda.net/wp-content/uploads/2024/09/2024-Fall-Workshop-Registration.pdf>

WORKSHOP 24 SCHEDULE AT THIS LINK:

<https://cafda.net/wp-content/uploads/2024/09/Fall-Workshop-Schedule-2024.pdf>

REGISTRATION IS NOW OPEN!!!

You are able to go on-line at our Website at CAFDA.net and pay with a credit card under the pull down tab **EVENTS/event registration**

Another Upcoming CAFDA Presentation for Fire District Officials

Save the Date: Thursday March 13th and Friday March 14th, 2025

Fire District Financial Training

Presented by the NYS-Office of the State Comptroller

To be held at Fulton Montgomery Community College, Johnstown, New York

Supported by Mohawk Fire District

Commissioners, Treasurers and Chiefs are cordially invited to attend

More Information to Follow

All correspondence & Capital Area Fire Districts Association Mailing Address should be directed to:
CAFDA PO Box 242 East Schodack, NY 12063 or EMAIL: SECRETARY@CAFDA.NET
Financial issues should be addressed to: TREASURER@CAFDA.NET

THE LATEST FROM THE STATE CAPITAL

ScoreCard

- Just waiting for bills that passed the Assembly and Senate to be sent to the Governor for signature.

OTHER FIRE SERVICE ORGANIZATION NEWS

Save The Date: 1st Annual FASNY Training & Educational Weekend

May, Friday the 16th through Sunday the 18th, 2025

Fort William Henry , Lake George, NY

An array of Speakers on many subjects including Chief Tom Richardson, Chief Tom Basher, D/C Tim Cowan, Brian McQueen, Chief Stefano Napolitano, Chief Doug Cline, Chief Justin Bailey and Ed Mann..

More information to come.

ASSOCIATION OF FIRE DISTRICTS OF THE STATE OF NEW YORK

2024 Annual Meeting and Leadership Expo

From October Sunday 20- Ending on Wednesday 23, 2024 at Turning Stone Resort and Casino

REGISTRATION IS NOW OPEN AT THIS LINK:

https://mms.afdsny.org/members/evr/reg_event.php?orgcode=FDNY&evid=40809591

NOTE: All attendees are responsible for making their own reservations and paying for their own room, room taxes, and incidental charges.

2 night minimum **\$231 - \$356 per night (room only, no meals)**

Reservation deadline: September 18, 2024

IF NOTHING ELSE READ THE ARTICLES PRECEDED BY **

THE LATEST FROM WASHINGTON

Now we can't wait until the election is over. Please Vote, not for the party but for the person who will lead America into the future for next four years with strength, honesty and dignity.

For information only and not for the purpose of providing legal advice. The opinions expressed are the opinions of the individual author at the time the facts were presented and based on the law then applicable. The information contained in these opinions is not guaranteed to be up to date. The information provided is not legal advice. Since legal advice must be tailored to the specific circumstances of each case, and laws are constantly changing, nothing on this site should be used as a substitute for the advice of competent legal counsel. The authors assume no responsibility to any person who relies on information contained herein and disclaim all liability in respect to such information. You should not act upon information in this publication without seeking professional counsel from an attorney admitted to practice in your jurisdiction.

FIRE DISTRICT FINANCES

Register "NYS GOVBUY 2024" events@ogsgovbuy.info

Save the date: November 21-22, 2024 Empire State Plaza Convention Center REGISTER NOW AT THIS LINK:

https://eventdex.my.site.com/BLN_RegistrationDym?id=a19Nt000001xfZdIAI

WHAT YOU WILL LEARN

New York State's annual GOVBUY conference catalyzes the growth of centralized contracts by fostering collaboration among stakeholders and driving sustainable procurement practices that benefit the citizens of New York State. Over 30 sessions and workshops will explore:

PURCHASING IN NEW YORK STATE

Learn about the procurement methods available to state agencies and when to use them.

GO GREEN! SUSTAINABLE PROCUREMENT USING OGS CONTRACTS

Learn about the latest green purchasing options available through OGS contracts, including green cleaning products, recycled copy paper, EPEAT computers, electric vehicles (EVs), EV charging stations and more.

PROCUREMENT RULES FOR LOCAL GOVERNMENTS/FIRE DISTRICTS AND SCHOOL DISTRICTS

Overview of the exceptions to competitive bidding under General Municipal Law, Section 103, including professional services, emergency contracts, and “piggybacking” on certain other governmental contracts, as well as a discussion of contracts below the statutory dollar threshold.

PREFERRED SOURCES BUYING STRATEGIES

Learn how to procure goods and services from Corcraft, NYSPSP and NYSID.

PBITS, HBITS, AND UMBRELLA CONTRACTS: THE CONTRACT TRIFECTA FOR OPTIMIZING YOUR IT SERVICE PROCUREMENTS

Learn the most efficient way to procure IT Services using Project-Based IT Services (PBITS), Hourly Based IT Services (HBITS), and the Umbrella Manufacturer and Distributor contracts.

CONTRACT MANAGEMENT

What happens after the solicitation is over and the contract is approved? Contract management is a key and time-consuming part of the overall contract life cycle. Whether it’s contract assignments, price changes, or holding the vendor accountable, contract management activities ensure the contract continues to work for the program and the organization. OGS experts will share some contract management activities and other strategies for effectively overseeing contracts after they have been awarded.

MORE DETAILED INFORMATION IS AVAILABLE AT THE OGS.GOV 2024 WEBSITE

FIRE DISTRICT BUDGET CALENDAR FOR 2024 CAN BE FOUND AT THIS LINK ON THE CAFDA WEBSITE:

<https://cafda.net/fire-district-budget-calendar-for-2024/>

The 2025 Tax Cap will remain at 2% for fire districts

Fiscal Oversight Responsibilities of the Governing Board

The governing board’s oversight role can touch virtually every aspect of a local government’s operations. This session will discuss some key functions including budget responsibilities, interim reporting, the audit of claims, and the annual audit requirements. We will also provide resources available to assist in these oversight activities.

DATE: 2024-01-24 LENGTH: 46:53 TAKE THIS ANYTIME AT THIS LINK: [On Demand Slide Show Presentation \[pdf\]](#)

Local Government and School Accountability Contact Information:

Phone: (518) 474-4037; Email: localgov@osc.ny.gov

Address: Office of the State Comptroller, Division of Local Government and School Accountability
110 State Street, 12th Floor; Albany, NY 12236

FIRE SERVICE APPARATUS-WHAT TO KNOW

The Apparatus Architect: Fleet Replacement Considerations & the Hicksville Fire Department Experience

Tom Shand & Michael Wilbur

Fire departments of all sizes are struggling to manage their fleet replacement program because of extended delivery times and increased costs for new apparatus. Changes in diesel engine technology because of the Environmental Protection Agency’s (EPA) 2027 emissions standards further complicate circumstances.

Departments that have a modest fleet that routinely obtain one new vehicle at a time are considering multiple acquisitions.

TWENTY YEARS AGO

The Hicksville Fire Department (HFD) in Nassau County, NY, protects a 7-sq.-mi. response area that has a population of 45,000 with four stations. A volunteer force operates five engines, two trucks, one heavy rescue and other support vehicles. The administrative functions are under the auspices of the Board of Fire Commissioners for Hicksville Fire District, which, among other tasks, oversees the department's apparatus fleet in conjunction with a district manager and mechanic. During 2023, the HFD responded to 1,864 incidents, including 17 working fires.

Prior to 2004, each company acquired a new apparatus individually. Designs were specific to each vehicle, based on input of company members and an apparatus committee. Past engines were built by several manufacturers. There was little standardization, bowing to each company's input.

With three engines approaching 20 years old, the decision was made to acquire three identical engines, which would enhance safety and fireground operations via standardized equipment locations, hose loads and major components.

The result: Delivery in 2004 of three Sutphen 2,000-gpm pumpers for Engines 933, 934 and 937. The vehicles included front intakes, electric valves with flowmeters for each discharge and a stainless-steel body. Tilt cabs and access panels that were located on the pump panel (to permit maintenance and repair work with minimal vehicle downtime) and identical major components proved to be an improvement over managing five different vehicle designs.

It's true that multiple-apparatus purchases can provide efficiencies and cost reductions because of engineering resources and coordination to manage the acquisition process (e.g., bid process, engineering conference and final inspections), but outfitting several rigs all at once can overwhelm a department shop. Another consideration: Time to train individual companies and to wrap up all warranty concerns.

It's vital for a department to have a good working relationship with the apparatus maker, its salesperson and the service provider for optimized engineering, production and after-delivery warranty services.

TODAY'S CHALLENGES

After 20 years with the uniformly designed/equipped engines, Hicksville Fire District set out to replace the rigs. An apparatus committee sought input from the district mechanic based on the experience from the existing engines.

(The other two engine companies operate vehicles acquired in 2007 and 2014. Those purchases reinforced the effect of major components, piping and equipment locations on vehicle downtime, training and fireground operations.)

Ordering an updated version of a current engine is difficult, if not impossible, because of changes in engine emissions and electronic components. Technology that leans toward more standardized cab and body designs is a factor, too.

Over the past decade, EPA emissions regulations have affected availability of diesel engine models and cab designs for apparatus makers. ***The EPA changes for January 2027 further will affect engine components and their packaging into custom cabs.***

As a result, some apparatus makers set up different production lines based on the degree of customization, which influences production time and the engineering resources required for each new rig. As production times have increased to more than three years for some vehicles, departments have had to alter their fleet replacement schedules to adapt to the extended delivery times and dramatic cost increases.

HFD'S RESULTS

The three new Sutphen Monarch engines are identical but for minor exceptions in paint colors and graphics. They were produced to allow for the district's mechanic to outfit each rig with tool mounting, radio installation and other initial upfit work.

The new engines were built on a 199-inch wheelbase. Their raised-roof, four-door, extended cab seats eight. An exterior compartment is designed for storage of a pressurized water extinguisher and forcible entry tools. The front bumper is extended 24 inches to accommodate a 5-inch front suction, a 1¾-inch trash line and individual hose wells.

The rigs have a 500-hp Cummins X12 engine and an Allison EVS 4000 transmission. Auxiliary braking is provided by a three-speed Jacobs engine brake and a focal-mounted Telma driveline retarder. The front and rear axles are rated at 23,000 lbs. and 27,000 lbs., respectively.

A Hale Qmax single-stage, 2,000-gpm pump has 6-inch inlets that have master intake valves that have manual overrides. ***There are no discharges on the left-side pump panel; two 2½-inch and one 4-inch large-diameter-hose (LDH) discharges are on the right side.*** The LDH and deck gun discharges have electric controls; the remaining discharges have Trident hand-crank controls. All discharges, including the two crosslay and four rear-body discharges, are outfitted with FRC combination pressure gauges and flowmeters.

Each engine has a mounted Akron 2,000-gpm, manually operated deck gun, a portable monitor and a four-way hydrant valve. Each engine carries 1,000 feet of 5-inch supply line, two beds of 2½-inch hose for back stretches, a 100-foot bumper line and four preconnected 1¾-inch lines. Each rig's 140-inch-long stainless-steel body is outfitted with standard engine company appliances, tools and equipment, which are mounted in standardized locations.

STEP INTO THE CHIEF'S OFFICE

****Where Is Our Culture Of Accountability?**

Chief Marc Bashoor

Many say that dealing with personnel issues is the most time-consuming challenge leaders face. ***I submit that much of the time spent on personnel issues could be eliminated if we, as leaders, were better at managing culture change in our fire departments. Culture change isn't always a comfortable conversation, but it's a crucial one, so let's get uncomfortable!***

CHANGE IS NOT COMFORTABLE

If I were to ask you when you are most comfortable, your answer would likely be something like:

- "When I am off duty."
- "When I am in a familiar place."
- "When I am with familiar people."
- "When I am doing familiar things."

Time off and positions of comfort are where we reenergize, maybe coping with all the difficult things we see on the job or even just catching up on lost sleep. Spending our time off the job, barring the challenges of mental anguish, we *should* be able to come back to work and be ready for what's next. And if we want to learn and grow in the process, we must be prepared to get uncomfortable because our lives don't always fit into those four statements above.

We've all heard the saying, "the only constant in life is change." *If change is inevitable, why have we historically been so horrible at it? In the simplest of terms, it is because change takes us from a place of comfort to a place of the unknown – the uncomfortable. Humans simply don't like to be uncomfortable.*

THE CULTURE OF ACCOUNTABILITY

I recently had a discussion with a chief about how firefighters are routinely reprimanded for bad behavior on the job, particularly related to harassment or discrimination, and yet we continue to struggle to simply wear seat belts on our fire trucks and ambulances or waist straps on our SCBAs – with no consequences.

At first, I thought the answer was easy in that there's a federal law that establishes the parameters of much of what we know today affecting harassment and discrimination. Conversely, there is no federal law requiring seat belt or waist strap use. There IS a federal law requiring seat belts to be installed on all vehicles except buses (which is still mind-boggling to me); however, the use of seat belts was voluntary until New York became the first state to require seat belt use in 1984. Today, the state of New Hampshire is the only state to not require adult seat belt use (equally mind-boggling to me that there is a state still not following suit). So, while there's no federal law requiring adult seat belt use, there are 49 state laws requiring them to be used.

Why are we allowing our firefighters to consciously break the law? We all know certain first responders who refuse to wear a seat belt, even though there are 49 state laws requiring them to do so. Where is our culture of accountability here?

Make no mistake, this is an accountability issue that pushes some beyond appropriate behavior. In fact, I was part of a department where, after a seat belt edict came down where battalion chiefs were instructed to write up anybody whom they witnessed without a seat belt, firefighters had navy T-shirts made with an orange strip resembling a seatbelt, so if the BC saw them on the road, it would *look* like they were wearing their seat belts. Once this was discovered, the chief took appropriate steps to cease that activity. Where was our culture of accountability at the personal and company officer level there?

SCBA – STRAPS AND BEARDS

With respect to SCBA waist straps, just wear the damn straps! If not for the proper fit and balance of the weight across your hips instead of on your back, then for the safer environment that doesn't have your straps catching on anything as you crawl through a search environment. Where is our culture of accountability here? When I was a chief, it was not

unusual for me to call out on the radio if I saw such an unsafe act as waist straps hanging down while firefighters were pulling ceilings on a burning balcony.

Furthermore, for many years before we understood and accepted the true dangers of carcinogens in our business, we paid little or no attention to the proper wear of breathing apparatus. Beards, once seen as a rite of passage in young firefighters, became taboo with OSHA respirator fit test requirements. While many firefighters have challenged this over the years, whether your state is an OSHA state or not, I assure you that OSHA standards fall into the “should of known” category when it comes to court. Regardless of that, the standard is meant to ensure a sealed fit to your facepiece, preventing carcinogens from entering your lungs. Isn’t that enough to convince you to shave? I continue to see firefighters across the country sporting levels of facial hair that cannot possibly pass a respirator fit test. Where is our culture of accountability here?

DRIVING DANGERS

Red traffic lights and stop signs are NOT suggestions, even if you have emergency lights and sirens running. While state laws and local policies differ, most either require a stop or allow responding apparatus to proceed through red traffic lights and stop signs with “due caution” or in a manner that they are “prepared to stop.” I’ve watched several videos this week (cell phone and dash cam) that show everything from two fire engines wrecking at a four-way intersection, to an SUV that slowed but did not stop, T-boning a car in an intersection, to an ambulance with total disregard for the red-light being T-boned, overturning and sliding. ***The right of way is NOT guaranteed to you in any manner of response.*** We must be *granted* the right of way. It is the driver’s responsibility to ensure that all other traffic is stopped before they can be reasonably assured that they have been granted the right of way. Where is our culture of accountability?

Speed and priority of response is another issue that has many variables and differing policies across jurisdictions. I encourage departments to give serious consideration to categorizing responses as something similar to “hot” (lights and sirens) when life safety and property conservation is at risk and “cold” (normal driving) when life safety and property conservation is not at risk. A recurring malfunctioning fire alarm would most likely *not* be a hot response. Yes, I am aware of two incidents, TWO, in 43 years where that alarm was something more than an alarm. You know your area, you know your response conditions – make the right decision based on what you know or suspect. We need to have better accountability here.

RESIDENTIAL SPRINKLERS

Only two states require residential sprinklers in new construction – California and Maryland. The District of Columbia also requires them. While we have had great advocacy from the National Fire Sprinkler Association, the National Fire Protection Association, the International Association of Fire Chiefs, the Congressional Fire Service Institute and many other fine organizations, I continue to meet fire chiefs who will not advocate for residential sprinklers.

One volunteer chief lamented how he would have fewer volunteers if sprinklers were putting out the fires. I’ve heard that time and time again over the years. We know from our experience in Prince George’s County (which was the first county to mandate residential sprinklers in new homes beginning in 1992), that residential sprinklers improve survival by nearly 100%. The NFSA cites 85% as the survival improvement with sprinklers. ***At the annual average of 3,000 people dying in fires annually, 85% would mean 109,650 fewer fatalities in the 43 years I’ve been in the service. Isn’t that enough to change your mind, chiefs? Where is our culture of accountability?***

AFTER-ACTION REVIEWS

Shelves in fire departments across the country are littered with lessons learned spelled out in AARs. We know that every one of the things I mention above has been identified as a lesson learned or a contributing factor in multiple AARs, some completed internally and some by third parties. Citing seat belts, if these were truly lessons learned, we wouldn’t continue to see firefighters thrown from fire engine wrecks. In my 43 years, I haven’t read ONE investigatory confirmation of a “seat belt malfunction” that would have allowed a restrained firefighter to be ejected from the vehicle. Where’s our culture of accountability?

TAKE ACCOUNTABILITY ACTION

Just like the dinosaurs that are not coming back, neither will rubber boots, bucket brigades, horse-drawn fire engines or back-step riding. While sometimes kicking and screaming, we have adapted to those changes. Many of the changes in safety are rooted in the names of firefighters who died in the line of duty – you likely know some of them.

We MUST hold ourselves accountable, both when we're right and when we're wrong. The next time you consciously choose to break the law or push the envelope with any of the topics we've discussed here, add "your honor" to the end of your explanation because that's where you're headed, as either a witness or defendant.

Be prepared to have the difficult decisions you'll need to have to improve your culture of accountability, and simply just do the right thing (JDTRT), for you, for your crew, for your family and for your community.

OUR CHANGING FIRE SERVICE –CHALLENGES & POSITIVE IDEAS!

POSITIVE OUTCOMES

Bill Tackles Medicaid Reimbursement Issues For EMS Crews

Roger Gilson-Times Union

Last week, the Greenport Rescue Squad in Columbia County rushed to a diabetic's home after his family called to report that he had lost consciousness. EMS personnel obtained a blood sample showing the man's blood sugar was "dangerously low," according to Greenport Rescue Squad Executive Director Aidan O'Connor. They started an IV and the patient regained consciousness, but the rescue squad was not done.

"We were there for nearly one hour assessing the patient, answering questions, making a peanut butter sandwich, calling the doctor and making sure the patient is safe and healthy," O'Connor said.

However, the patient, who was on Medicaid, did not want to go to the hospital. Therefore, everything about the response — the IV fluids, the gas for the ambulance, EMS personnel's time — was not reimbursed.

About 30% of all EMS responses in New York do not result in a patient being transported to the hospital, according to Jeffrey Call, the former chair of the United New York Ambulance Network. Since about 43% of all New Yorkers are on Medicaid, this punches a significant hole in rescue squads' budgets.

On Friday, EMS leaders gathered in Columbia County to advocate for a bill that would end this practice. The bill unanimously passed the state Senate and Assembly earlier this year, and its sponsors, state Sen. Michelle Hinchey and Assemblywoman Anna Kelles, are pressing Gov. Kathy Hochul to sign it by Sept. 30 so the law will take effect this year. If Hochul signs it after the 30th, the law will not take effect until Oct. 1, 2025.

Call said ambulance services could have more breathing room if they received reimbursements from Medicaid calls where there was no hospital transport, freeing up money for more equipment, and to recruit and retain staff. The average EMS technician in New York state makes \$22.23 an hour, according to Indeed.

County and municipal governments, who must make up part of the revenue lost from Medicaid calls, would also benefit from the bill, according to Call.

The bill would also provide more options for EMS crews trying to help patients. Some patients need to go to a mental health facility or an emergency clinic, and the bill would allow Medicaid reimbursement for these transports. The bill would allow EMS crews to keep patients at facilities in their communities.

"Not everyone needs to go to the ER," Hinchey said. The best place to take a patient "might not be the hospital" because of increasing wait times at emergency rooms, O'Connor said.

Extended wait times at emergency rooms are a national problem felt particularly strongly in the Capital Region. The average wait time at Albany Medical Center is the longest in the state and is two hours and 22 minutes longer than in 2016. Paramedics must wait with patients at ERs until they are seen, making them unable to respond to other calls. EMS crews must also sometimes transport patients' long distances to be seen when local ERs are full: Hall said patients sometimes had to be transported from Watertown to Westchester Medical Center, a distance of more than 300 miles, "because hospitals are so overtaxed."

The opioid crisis has also taxed EMS services. When a crew receives a call for a suspected overdose — calls that rarely come from the person overdosing — the crew responds and administers the overdose reversal drug Narcan, according to Call. **When the patient is revived, they almost always refuse to be transported to a hospital. If the patient is on Medicaid, there is no reimbursement for the call.**

The bill's sponsors represent mostly rural areas of upstate New York. Kelles said EMS services were especially critical in these areas, since hospitals can be more than an hour away, and patients sometimes have to be cared for in place.

O'Connor told a second story at Friday's news conference: a 13-year-old fell off a swing set at a rural playground. When the EMS crew arrived, it was obvious the child needed stitches, but the mother, with tears on her face, had to tell paramedics she did not have enough gas to follow the ambulance to the hospital, nor enough money to afford the parking fee there. The hospital was 50 minutes away, while an emergency clinic was 15 minutes, O'Connor said. **With the new bill, EMS crews would not have to take into consideration reimbursements when making this decision.**

FIRE SERVICE CHALLENGES

'Rogue' Fire Department Raises Eyes in Ramapo, NY

Peter Matthews

A group of first responders who are focused on protecting select citizens in Ramapo are raising the eyes of local officials in Rockland County. The group, Matzilei Aish, has a couple dozen members who respond to Hasidic and Orthodox Jewish communities in Ramapo.

"This is a rogue fire department that needs to be brought to task," Rockland County Sheriff Lou Falco told LoHud.com. "If they want to join a fire department, that is what they should do. We don't know the abilities of this rogue fire department."

They are asking residents to call them, instead of calling 9-1-1 to dispatch local firefighters, including the Monsey Fire Department and companies in Spring Valley.

Among the concerns from local officials are following state and national reporting standards.

The group has been known to respond to emergencies for a few years, Rockland County Fire and Emergency Coordinator Chris Kear told the newspaper. He said they were responding in their own vehicles and carried fire extinguishers.

"They have publicly and privately encouraged residents to call them directly, and not to call 911," Kear wrote. "In addition, they have been advertising their intent to expand into additional geographical locations."

He added, "With the new addition of a ladder truck and their intent to expand, the potential of a very dangerous situation continues to grow."

While the Matzilei Aish members have not taken classes at their local fire academy in Rockland, they some believe they have taken Firefighter I training across the state line at the Bergen County Law and Public Safety Institute in New Jersey. Some of the Rabbis who run the group have said that Matzilei Aish are not ready to respond to major incidents. Local officials are monitoring the situation, with some being aware and others saying they have no knowledge of the group.

Concerns about the group's operations and citizen safety have been brought to the state's Attorney General and the Department of Labor, of which the latter acknowledged they are investigating the group.

[WHAT'S THE PROCEDURE FOR A ROGUE FIRE DEPARTMENT IN NYS, WHAT CAN BE DONE, THIS SHOULD BE INTERESTING TO WATCH.]

U.S. Regulators Open Probe into Reports Of Jeep Suvs, Pickups Catching Fire Even With Ignition Off

U.S. auto safety regulators are investigating reports that the engines can catch fire on some Jeep SUVs and pickup trucks even with the ignition turned off. The probe covers more than 781,000 **Jeep Wrangler and Gladiator vehicles from the 2021 through 2023 model years**. The National Highway Traffic Safety Administration says in documents posted Monday on its website that it has nine complaints of engine fires from owners including one that caused an injury. A majority of the reports say fires began in the passenger side of the engine compartment. The agency says a fire with the ignition off "can result in an increased risk of occupant injury, injury to persons outside the vehicle, and property damage, with little or no warning."

Flashover And Bailout As Mass. 6-Alarm Fire Injures 4 Firefighters

At one point, firefighters conducting an interior attack on the flames were called to exit the building due to the extreme conditions. "There was a very intense fire condition in the attic," Charron said. "The fire companies had to evacuate

when the fire flashed over. They had to bail out pretty quickly.” According to Charron, one firefighter had to jump out a window, while others took the stairs.

In total, 11 firefighters were evaluated by emergency medical services at the scene, with four hospitalized. Additionally, a resident of the building was hospitalized due to smoke inhalation.

[PESH NOTE: NO HALLIGAN BARS, NO ROPES, NO BELTS, JUST GET THE HELL OUT QUICKLY]

TRAINING FOR YOUR MEMBERS AND OFFICERS: PLEASE PASS IT ON!!



NATIONAL VOLUNTEER FIRE COUNCIL – TRAINING TIMES – COURSES/WEBINARS/EVENTS

LINK TO THE VIRTUAL CLASSROOM: https://virtualclassroom.nvfc.org/featured_courses

Webinar - Safe Roads, Safe Responders: Educating Communities on Roadway Incident Safety

September 17 at 1pm ET - Presenters: Todd Leiss and Jack Sullivan

Engaging the community in roadway safety is a key part of reducing first responder injuries and death in traffic incident management. Just in time for your fall open house, this webinar will discuss ways to incorporate key topics such as “move over,” preventing distracted driving, and how to pass an emergency scene safely in your community education initiatives.

REGISTER AT THIS LINK:

https://gma5qspab.cc.rs6.net/tn.jsp?f=001ctMESZes4UYZmC6kmzTGzA3m4MzVf2xtbYoyj-QM8QbvxkgI5sFArcyHcrAO1lmRZ7cpLIIHU8vKf2m6JgPjE-J8QqicbvJ85ultvh2Wvo16q0dUbQXRSxan0Aili1EkZSgyTwL7dbupqrzPwV02uLfx-4acDlt9vTd-2iy8tsnz8LV01eS-Og4QinrgSLgCxPMZJq6LDPPrOfGfaT-0pg==&c=4j7vBjBizBkegmHmYyOokHW5dz8dQb-Qe02M14nYfipFAL3nYExZuA==&ch=p9wBZbvunXAkzGtO-WlwkWxLpZ_Mu5LjZ8hgsz1Frh_45XtnRn6Fg==

Webinar - So You're a Training Officer: Now What? Incorporating Adult Learning Theory into FD Training Programs

Nov. 13 at 2pm ET Presenter: Rachel Buczynski

REGISTER AT THIS LINK:

https://us06web.zoom.us/webinar/register/WN_ilTmPyf-S8qeMO_-3YEIFA#/registration



Webinar - Finding Future Firefighters: Recruiting and Retaining Gen Z

Move over millennials, there's a new kid in town. Generation Z - those born between 1997-2012 - are becoming young adults. Harnessing the energy and potential of Gen Z volunteers is crucial for organizational success. This session will explore the unique characteristics, motivations, and communication preferences of Gen Z individuals to equip you with the tools necessary to attract and retain this dynamic demographic. From leveraging social media platforms to understanding their passion for purpose-driven initiatives, participants will explore innovative strategies tailored to effectively recruit and empower Gen Z volunteers.

REGISTER AT THIS LINK: search. Defensive tactics involve our escape plans, which are needed as we complete our search, but more importantly under extreme or emergency conditions. To make these tactics work, we must always have our strategy front and center. Both sides of the coin are in play all the time. In this three-hour program, students will examine strategy and tactics to gain a more concise understanding of the training necessary for search.

REGISTRATION FEES:

\$35 – NYS AFC members • \$50 – non-members (per person)

Pre-registration is encouraged. New – online group registration is available for fire departments!

REGISTER HERE:

https://r20.rs6.net/tn.jsp?f=001QZWPfjYZRP6tAYnVrgg36Z_YE6vp89dymWfQQD1d7q4ZRwVDbNdE8ByVmF5_856f_UrB-yGihYJgwEPzCbQfCVeoeEALHRXrk_M-dbDWBRYRtKiko1vLice_oi1AFseMKfN01xTmCmiyzyMWYur-39p1T1V2_yChO2C2F1_fln94LviwvZ3Aag==&c=AmhECQ6uFruSlwrKRKspNlivi3NWEIzhZOrf3KrFnUls83Dp1Q1JdQ==&ch=AqMwftSnQgSSioeldoQJ-cfc_GyhBFLqV23YaEp7HU-kr9WoEr9kSg==

7:00pm STARTING TIME

Otsego (Wednesday, September 25)

Rensselaer (Tuesday, October 29)



NYS AFC Hands on Series

FIRE BEHAVIOR ON THE INSIDE

- **Schenectady County – October 19-20**, East Glensville Fire District #3 REGISTRATION:
<https://www.nysfirechiefs.com/firebehavior>



The fall leg of the 2024 Seminar Series kicks off in September!

Searching tactics are primarily thought of as an offensive action – moving in, checking behind doors, in closets, and numerous other areas. As we search, our concerns are focused on the search. Defensive tactics involve our escape plans, which are needed as we complete our search, but more importantly under extreme or emergency conditions. To make these tactics work, we must always have our strategy front and center. Both sides of the coin are in play all the time. In this three-hour program, students will examine strategy and tactics to gain a more concise understanding of the training necessary for search.

SEMINARS ARE COMING TO THESE COUNTIES (7:00 P.M. STARTING TIME):

Cortland (October 22) • **Erie** (September 18) • **Jefferson** (October 1) • **Monroe** (November 5) • **Oneida** (October 23)
• **Otsego** (September 25) • **Rensselaer** (October 29) • **St. Lawrence** (September 4)

REGISTRATION:

\$35 – NYS AFC members • \$50 – non-members (per person)

Pre-registration encouraged!

REGISTER AT THIS LINK:

https://ygc8ha5ab.cc.rs6.net/tn.jsp?f=001kuqLgpLbccSUrlvWbOM--WOyxcGN33wsn9CB40zBMzH5JrQ8kdAu-U9rcqOHazSAzEMaxVMNEpSigloNLWx_FYDCKrLQIQfAwRv9fZGoCA39a8F854FdGooPPW5nhlimjwCY_z-Ppvs9xlbWg4t2soeB2xbgSHSWBkR3FQNgfUCMou6eD6ReaQ==&c=6nGkXVEGAjcnabshBE8sbLM6Gn8YA1sFFRufb2MsKAKCEPyxSmObRg==&ch=ZrLEy5qUdq74vNpCsQnMdYy3z1L5PpLySA1u3R47oxFRQnYmdcSRQ==



Refusals & AMAs ESIP WEBINAR SERIES

During this webinar we will discuss what calls and what patients should be considered to obtain documentation of a patient refusal, and what patients might need to be transported for further evaluation.

Wednesday 9/17/24 at 7PM

REGISTER AT THIS LINK:

<https://mcneilandcompany.us8.list-manage.com/track/click?u=03596f243a9d922954ebaf15e&id=8fab585f52&e=781e9a2c81>

VFIS TRAINING AND RESOURCE CATALOG 2023

<https://afdca.org/wp-content/uploads/2023/02/2023-ETC-Resource-Catalog-VFIS.pdf>

VFIS UNIVERSITY – USERS GUIDE

<https://afdca.org/wp-content/uploads/2023/02/VFIS-University-User-Guide-3.pdf>

VFIS TRAINING OFFICER USERS GUIDE

<https://afdca.org/wp-content/uploads/2023/02/VFISU-Training-Officer-User-Guide.pdf>

VFIS RESPONDER HELP FLYER

<https://afdca.org/wp-content/uploads/2023/02/2023-VFIS-Responder-Help-Flyer.pdf>

FF HEALTH AND SAFETY – TAKING CARE OF OUR MEMBERS!

*****NIOSH Cites Factors In Firefighter's Death In Leonardtown, MD, House Fire***

Susan Nicol

"Fire departments should develop policies to aid in the selection of the appropriate strategy and tactics for offensive, defensive, and transitional attacks."

That was one of the recommendations that NIOSH officials suggested following their probe of 2023 house fire in Leonardtown where Patuxent Naval Air Station Firefighter Brice Trossbach perished.

Two minutes after he and another firefighter launched an interior attack, he fell through the floor into the basement.

A rapid intervention team (RIT) and others made several attempts to rescue him. However, the operation became a recovery mission.

His body was recovered nearly two hours later. He was pronounced dead at a local hospital.

Richard McNeil, who owns the home, said he and his family were overwhelmed with sadness about Trossbach's death. They escaped before firefighters arrived and were standing in a nearby yard.

In addition to compromised situational awareness, investigators said other factors include:

- ***• Ineffective risk/benefit analysis and scene size-up***
- ***• Ineffective use of appropriate strategy and tactics***
- ***• Ineffective professional development***
- ***• Lack of ongoing crew integrity***
- ***• Lack of information shared from 9-1-1 caller to responding unit***

RECOMMENDATIONS INCLUDE:

- Fire departments should develop and implement a professional development plan to ensure all personnel receive technical and academic competencies relative to the roles personnel are expected to perform on emergency scenes
- Incident commanders and company officers should ensure that crew integrity is properly maintained by visual, direct, or verbal (voice or radio) contact when operating in an immediately dangerous to life and health (IDLH) atmosphere.

343 ON 9-11 AND 371 SINCE 9-11

IN 2024 WE HAVE EXPERIENCED 40 FIRE FIGHTER LODD'S

According to FirefighterCloseCalls.com*

In 2023 we experienced 82 LODDs reported nationally.!

DOES'NT HAVE TO BE A FATALITY-JUST A DIBILITATING INJURY!

- September 7, 2024, Indianapolis firefighters were mitigating a MVC. Two firefighters who were in the process of wrapping up and awaiting the arrival of Indiana State Police were hit when a 30-year-old male driver plowed through the incident

scene. Both firefighters were transported to an area medical facility. One firefighter sustained minor injuries and was checked and released. The second firefighter sustained serious but nonlife-threatening injuries and was admitted.

- Two Indianapolis (IN) firefighters were injured early Wednesday morning during a roof collapse on the fireground, according to a release from the department. Both firefighters were stuck in the burning debris, which included roof joists, flooring, and drywall. A Mayday was immediately declared; within a minute of the collapse, the crews were able to remove themselves from under the debris and exit the structure.
- A firefighter was hit and injured at a crash scene on the Capital Beltway I-495 in Montgomery County, Maryland early Friday will be OK. The lieutenant was walking back to other firefighters when a vehicle entered the operations zone, struck two state police vehicles and him, Montgomery County Fire Rescue PIO Pete Piringer said. He was able to get up and walk to the firefighters who immediately started treatment. He was transported to a local trauma center and released after treatment, Piringer said. The troopers escaped injury.

BUILDING CODE, FIRE FATALITIES, AND FIREFIGHTER INJURIES – A LINK!

Y’a know, if we had sprinklers in 1 & 2 family homes by now the death toll of 700+ would be a hell of a lot less and fewer firefighters would be injured. But because builders and realtors make big contributions to politicians, sprinklers have been negotiated out of the Code!!

An awfully expensive price to pay to save money. Stop the carnage, install residential sprinklers.

Residential sprinklers are a component of the plumbing system, with approximately 1 head per room. The purpose of residential sprinklers is to allow time for the occupants to escape. Residential sprinklers are designed for quick response and only one at the most two heads may be triggered. With residential sprinklers present, the civilian death rate is 89% LOWER. Residential sprinklers will assist responding firefighters to do their jobs and save firefighters lives also, especially since everyone is short staffed!!

CHIEFS NEED TO SPEAK UP: Our fire problem would not be as bad if there were residential sprinklers!!

HOME FIRE FATALITIES REPORTED BY THE MEDIA FROM THE US FIRE ADMINISTRATION	
Fire Deaths in 1&2 Family Dwellings in NYS	41
Last fire death 9/9/24 Marathon, Cortland Co. Male 71	
Fire Deaths in any type of Dwelling in NYS	79
Fire Deaths in 1&2 Family Dwellings Nationally	857
Top 3 States with the greatest 1&2 Family Deaths	#1 PA/71
	#2 TX/57
	#3 CA/43
There has been a total of 1409 civilian home fire fatalities in 2024	
There were a total of 2127 residential fire fatalities reported in 2023 in the US media.	
We are in Week 29 of 2024, fire has claimed on an average 26 lives PER WEEK, perhaps OSHA should examine that death toll.	
Both the states of Maryland and California as well as Wash. DC require sprinklers in residential dwellings	

LIVING WITH NEW GREEN TECHNOLOGY

Battery Storage Fires Prompt CA Officials to Approve Safety Regulations

Rob Nikolewski-The San Diego Union-Tribune

Though details still need to be hammered out, the San Diego County Board of Supervisors passed a measure Wednesday aimed at bolstering safety regulations for future battery energy storage facilities in the county. Coming on the heels of **a string of recent battery fires** in the region, the measure will affect future energy storage projects and 10 that are already in the county’s pipeline, including one that a private company wants to build between Escondido and San Marcos that has generated controversy.

The still-to-be adopted regulations will be based on a technical study the county fire department is about to complete in coordination with a battery storage consultant.

“The big thing that was passed today was to complete the technical study that will look at fire-related issues with (battery energy storage) facilities that will then allow us to put additional guidelines in place for these facilities,” San Diego County Fire Chief Tony Mecham said.

The technical report is expected to be completed next month and county fire officials will then work with seven other independent fire districts in unincorporated areas of San Diego County to come up with one uniform safety standard for battery projects.

“We all want to move forward together,” Mecham said, “because we don’t want one standard in Alpine, another in Lakeside and another in County Fire.”

Among the regulations to be hashed out: buffer zones to protect residential areas in the event of a fire breaking out.

Per Wednesday’s action, a plan will come before the county Board of Supervisors by Dec. 11.

The measure passed 4-1, with District 5 Supervisor Jim Desmond casting the dissenting vote. Desmond approved the stipulations in the measure but wanted to add an additional safety precaution — a moratorium to prohibit the battery storage operations in facilities that don’t have isolated containers.

On May 15, a fire broke out at the Gateway Energy Storage facility in an industrial park in Otay Mesa. The batteries that ignited at Gateway were stored in a warehouse. **“The warehouse burned for 17 days, and I can’t believe that didn’t put a lot of toxic smoke” into the air, Desmond said.**

Going into Wednesday’s meeting, a spate of fires has turned up the volume in the debate about battery facilities.

Some county residents worry about potential fires forcing them to evacuate from their neighborhoods, while energy companies and environmental groups say adding extra layers of regulation will strain the electric grid and take away a key tool toward meeting state and local climate action targets.

Both sides appeared optimistic about what the county and fire officials will eventually adopt.

“The board action goes to the heart of the issue, which is **these facilities are too close to homes, schools and hospitals,**” said Joe Rowley, a retired engineer who opposes the Seguro Battery Energy Storage Project that Fortune 500 company AES wants to build in Eden Valley. “This study will tell us how far these facilities must be from those sensitive areas and that’s a very positive development.”

AES officials, meanwhile, vowed the company “will meet or exceed all required safety standards” that are enacted.

“The Board of Supervisors made the right decision today,” Corinne Lytle Bonine, AES permitting director for the Seguro project, said in an email. “The decision showed that we don’t have to choose between safe neighborhoods and clean air. We can have both.”

AES wants to build the Seguro project on a 22.5-acre plot between San Marcos and Escondido. The company considers the site an excellent location because it’s close to an existing San Diego Gas & Electric substation, so it can feed into the state’s power system without requiring miles of overhead transmission lines.

If approved, the facility would generate 320 megawatts and 1,280 megawatt-hours of electricity that would flow to California’s electric grid — **enough to power about 240,000 homes for four hours.**

Three fires at battery storage facilities in the San Diego area have broken out in the past year. **Last week, a fire at SDG&E’s 30-megawatt, 120-megawatt-hours facility in Escondido led to the evacuation of about 500 businesses. Classes were canceled for one day at nearby schools “out of an abundance of caution,”** the Escondido Union School District said.

Crews from the city of Escondido and SDG&E said the fire was centered in one of the 24 battery storage containers at the site. Extinguishing battery fires can be tricky and officials decided to let the fire burn itself out while protecting the containers around it.

Crews found no abnormal readings indicating toxic fumes and air-quality monitoring did not indicate any health risks.

The 250-megawatt Gateway Energy Storage facility, site of the May 15 fire, is operated by LS Power and its subsidiary, Rev Renewables. Opened in 2020, the facility stores dozens of racks of lithium-ion batteries that help bolster the state’s electric grid.

Fire officials said the batteries experienced “thermal runaway” — a condition in which excessive heat results in a chemical reaction that spreads to other batteries — and evacuation orders and warnings were put into effect for nearby businesses.

In September 2023, a fire ignited at the Valley Center Energy Storage Facility, operated by renewable energy company Terra-Gen. While fire officials said the blaze was extinguished by the site's internal fire prevention system in about 45 minutes, **businesses and the small number of homes within a quarter-mile of the industrial park where the facility is located were evacuated** and shelter-in-place orders were in effect within a half-mile of the site as a precautionary measure.

The 139-megawatt, 560-megawatt-hour Valley Center facility was back in operation the next day.

Battery storage is considered a crucial piece in California's policy goal of deriving 100 percent of its electricity from carbon-free sources by 2045, if not sooner.

Storage systems take solar power generated during the day and discharge the electricity later, especially from 4 to 9 p.m. when California's grid is under the most stress. Batteries can help reduce the risk of rotating power outages and replace natural gas "peaker plants" used during those critical hours when customers crank up their air conditioners.

Five years ago, the state counted a mere 770 megawatts of battery storage available to the California Independent System Operator, which manages the grid for 80 percent of the state and a small part of Nevada. By the end of this year, 10,379 megawatts are expected to be online and the state aims to grow that number to 52,000 megawatts by 2045.

Jim Whalen, president of J. Whalen Associates, a consulting firm in San Diego involved in battery storage projects in the San Diego area, said the board "chose the wise middle ground" with its vote.

"This is the takeaway: The fire code trumps land use approvals," Whalen said.

[EDITOR'S NOTE: COMING TO A NEIGHBORHOOD NEAR YOU!]

FDNY: Lithium-Ion Batteries, Burning E-Bikes Found In Brooklyn Apartment Fire

The FDNY says they battled a fire on the sixth floor of an apartment building in Brighton Beach at around 4 p.m. on Tuesday. FDNY Battalion Chief Michael Stone told News 12 **they discovered "several burning e-bikes powered by lithium-ion batteries."** "The fire condition wasn't that severe, but the smoke condition was," Chief Stone added. "The smoke from those lithium-ion batteries, fires, are very toxic. It's a little bit different from your regular smoke." The superintendent of the building told News 12 in Spanish that the tenants in that apartment have caused similar issues in the past. "We've always had problems [with them]. This is the second fire here," Alberto Nando said. "Scooters, batteries, everything's in there." FDNY officials say four people were transported to Coney Island Hospital for minor injuries.

Battery Storage Moratorium Approved in Somerset (NY)

Tom Tedesco – Lockport Union-Sun & Journal

The Somerset town board (Niagara Co.) has approved a moratorium on the development of renewable energy systems that utilize battery storage.

The board unanimously agreed to a six-month halt to town processing of any applications for permits related to solar and/or wind energy projects that have battery energy storage systems.

While the board did adopt a local law regulating such installations in 2022, town Supervisor Jeff Dewart said the board is taking action on battery storage systems that **other local municipalities, including the towns of Royalton and Wilson, took in the wake of a July 2023 incident in Lyme, Jefferson County, where four lithium battery storage trailers caught fire at a Convergent Energy solar installation.**

"We're waiting to see who's going to come in and say, 'Look, this is how to put a fire out.' We've got nothing other than to let it burn or surround the grounds for hours. That's all we got. That's why we're doing this," Dewart said.

He previously said that in the interim, "a few companies" have been soliciting the town to seek approval to implement renewable energy facilities that would utilize battery storage systems.

Those who spoke at Wednesday night's public hearing were overall in favor of the town board's move to halt the development of such systems in the town.

Somerset resident Jim Hoffman hopes that the board re-examines the existing law over the course of the six-month moratorium.

"It'll give us a chance to update our law, and a lot has happened since we wrote that law, and the state apparently has taken some looks and has some guidelines on how to cope with lithium ion battery fires," Hoffman told the board.

"The bottom line is there's no way to fight them other than to let them burn out. And that creates a lot of issues and a lot of problems. Does our fire company have the skills and equipment to deal with that?"

Dewart said that over the six-month period the board does not have any plans to change or draft any new local laws related to battery storage but may look to extend the moratorium by another six months when the current one expires.

Resident Betty Wolanyk also said she supported the moratorium, noting the lack of firefighting skills and equipment to handle any potential lithium-ion battery fires.

"I'm against lithium-ion battery storage for commercial purposes. I think it's way too dangerous and I think ongoing fires even within the state indicate that that's the case. I only wish the moratorium were longer than six months," Wolanyk said.

[Follow up to Earlier Article: It Took 50,000 Gallons of Water To Put Out Tesla Semi Fire in CA](#)

Tribune Content Agency

California firefighters had to douse a flaming battery in a Tesla Semi with about 50,000 gallons (190,000 liters) of water to extinguish flames after a crash, the National Transportation Safety Board said Thursday.

In addition to the huge amount of water, firefighters used an aircraft to drop fire retardant on the "immediate area" of the electric truck as a precautionary measure, the agency said in a preliminary report.

Firefighters said previously that the battery reached temperatures of 1,000 degrees Fahrenheit (540 Celsius) while it was in flames. The NTSB sent investigators to the Aug. 19 crash along Interstate 80 near Emigrant Gap, about 70 miles (113 kilometers) northeast of Sacramento. The agency said it would look into fire risks posed by the truck's large lithium-ion

The agency also found that the truck was not operating on one of Tesla's partially automated driving systems at the time of the crash, the report said. The systems weren't operational and "could not be engaged," according to the agency.

The crash happened about 3:13 a.m. as the tractor-trailer was being driven by a Tesla employee from Livermore, California, to a Tesla facility in Sparks, Nevada. The Semi left the road while going around a curve to the right and hit a tree, the report said. It went down a slope and came to rest against several trees. The driver was not hurt.

After the crash, the Semi's lithium-ion battery ignited. Firefighters used water to put out flames and keep the batteries cool. ***The freeway was closed for about 15 hours*** as firefighters made sure the batteries were cool enough to recover the truck.

Authorities took the truck to an open-air facility and monitored it for 24 hours. The battery did not reignite.

The NTSB said all aspects of the crash are under investigation as it determines the cause. ***The agency said it intends to issue safety recommendations to prevent similar incidents.***

A message was left Thursday seeking comment from Tesla, which is based in Austin, Texas.

After an investigation that ended in 2021, ***the NTSB determined that high-voltage electric vehicle battery fires pose risks to first responders and that guidelines from manufacturers about how to deal with them were inadequate.***

The agency, which has no enforcement powers and can only make recommendations, called for manufacturers to write vehicle-specific response guides for fighting battery fires and limiting chemical thermal runaway and reignition. The guidelines also should include information on how to safely store vehicles with damaged lithium-ion batteries, the agency said.

Tesla began delivering the electric Semis in December of 2022, more than three years after CEO Elon Musk said his company would start making the trucks. Musk has said the Semi has a range per charge of 500 miles (800 kilometers) when pulling an 82,000-pound (37,000-kilo) load.

[After I-15 Fire In California, New Rules Proposed For Lithium-Ion Battery Transport](#)

VIDEO: About eight weeks after a fire shut down Interstate 15 between Las Vegas and Los Angeles, U.S. Rep. Dina Titus (D-Nev.) is proposing new rules on the transportation of lithium-ion batteries. The 44-hour closure of I-15 about 25 miles east of Barstow was a major problem for weekend travelers on their way to Las Vegas. A flatbed truck carrying six industrial-grade batteries overturned on the shoulder of northbound I-15, stopping traffic for miles in 110-degree heat. Now Titus has introduced the "Thermal Runaway Reduction Act," which focuses on ways to reduce the potential for thermal runaway — when the temperature of a battery increases uncontrollably, often leading to a fire. Las Vegas Mayor Carolyn G. Goodman cited the crash and freeway closure as more evidence that California should take steps to widen I-15.

HUMAN RESOURCES FOR THE FIRE SERVICE

[The Human Resources Disconnect: How Fds Can Bridge The Gap](#)

Linda Willing

It's a two-way street; HR professionals should do more to understand the industry and fire leaders should better explain the needs of members.

I recently attended an online class given by a large human resources company on the topic of workplace etiquette. I thought it would be good to get a wider perspective on this topic that could potentially be applied to the fire service. I expected to come away from the class with some new information and insights about how to increase civility and cooperation in the workplace that would benefit those who work in emergency services. ***Those expectations were not met.***

The majority of the class talked about how to develop and enforce dress codes at work and how it might be helpful for managers to “dress down” when dealing with those who work in jobs that focus on manual labor. There was some talk about how to manage last-minute time off requests. There was a self-congratulatory discussion about how to make the employees’ handbook more appealing, including a discussion about how one organization created a meme named Polly C (Polly C = policy; get it?) to introduce new HR policies.

In other words, this class had zero applicability to fire and emergency services. In fact, I could see firefighters gagging (or worse) in response to the course content. And that is often the reaction to HR by people in those fields.

Working in HR can be tough. The job, which often doesn’t pay very well, has expanded dramatically in the past decade with attention to infectious disease protocols, workplace violence prevention, remote work standards, changing laws, and backlash against DEI initiatives. One attendee at an HR conference said while most HR professionals go into the field to be helpful, “a lot of employees look at us as inherently evil.”

In my experience, this is certainly true among firefighters. And if not evil, then simply irrelevant and annoying, like a buzzing fly that must be dealt with before more important work can begin.

This is unfortunate for several reasons. First, HR is not going away. They fill a key role legally and functionally within organizations, government and other entities. Most HR professionals are well trained and a valuable potential resource. But they are also by necessity generalists, and that does not work well when coordinating with more specialized workers such as emergency responders.

I have had experience with HR staffers who did not know what shifts firefighters worked, or how they scheduled time off. They had no idea of the stresses they faced or their unusual working conditions. This basic disconnect led to a credibility gap that made any further interaction essentially useless.

Can this gap be bridged? I believe it can, with effort on both sides. HR professionals need to understand the working conditions and needs of all their constituents. They need to reach out to all departments under their purview and take the time to comprehend the unique challenges those workers face. Training and onboarding for HR personnel should include personal contact with all departments they oversee and clear understanding of the different working conditions and challenges that workers face.

But such outreach cannot be unilateral. Fire service leaders need to welcome HR individuals into their workplace to better understand fire department members and their needs. This can happen on several different levels, but just having an HR staffer do a full day ride along would probably be enlightening and increase communication and empathy. Assigning a higher-level officer as the HR liaison would establish a known communication route that could be used for both routine information sharing as well as crisis intervention. Having firefighters at all levels participate in committees or work groups as equal members with others from different departments can provide an opportunity to get to know people in a less formal and potentially adversarial setting.

The bottom line is that fire departments need to have a good working relationship with HR. There will be times when members need expert advice or support, whether it be for resolving a workplace dispute or unraveling employee benefits. **HR professionals have some expertise (and power) that most fire service members do not have, and having access to that knowledge in a collaborative forum can be invaluable.** It benefits no one when interdependent agencies continue to have adversarial relationships – both sides of the equation are responsible for doing better.

HAPPEN’N IN THE NEIGHBORHOOD

Gansevoort Fire Department Breakfast

Sunday **October 20th** at the Gansevoort Fire Station 1870 Route 32, Wilton, NY
All you can eat, these folks provide a great breakfast, something for everyone!!

Perth Volunteer Fire Department Cornhole Tournament

Perth Fire Station, 4080 State Highway 30, Amsterdam, NY

Saturday, September 21st.

Text or Call 518-866-1606 To Register

Airmail Challenge!!

Raffles-Cash Prizes-Drinks-Monty’s Food Truck on Site

[SEE ATTACHED SPONSOR LETTER FOR AREA BUSINESS](#)

LAUGH OUT LOUD!!

SO, WHEN THE EV BATTERIES OVERHEAT ON THERMAL RUNAWAY
AND BURST INTO FLAMES PRODUCING TOXIC SMOKE, IS IT STILL
CONSIDERED A ZERO EMISSIONS CAR/TRUCK?
ASKING FOR A FRIEND....

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The Capital Area Association represents any fire district that wishes to join CAFDA. Fire District Officials include Commissioners, Treasurers, and Deputy Treasurers. Secretaries and Chiefs are also invited to participate!

Please advise your secretaries that all correspondence should be mailed to:

CAFDA PO Box 242 East Schodack, NY 12063

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518-407-5020

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[Long Way to Travel Zoom into the General Membership Meetings!](#)

It's our desire that every member fire district have the opportunity to attend Capital Area meetings. We know we cover a large area, in 8 counties and beyond, and wish to give all of our members a chance to participate in the general membership meetings. You have a voice, and we would like to hear it. Join us at our next meeting either in person or via Zoom. The link will be sent via constant contact prior to each general membership meeting. Thank you for being a member and we hope you will join us.

FIRE DISTRICT RESOURCES - - THE BACK PAGE - - FOR YOU TO FOLLOW UP!

[What are the duties and responsibilities of a Commissioner?](#)

The Answer is posted on our web site at www.CAFDA.net

[Vital Statistics on the State Association Regions – the break out is on our web site.](#)

CAPITAL AREA BUSINESS PARTNER'S

PLEASE SUPPORT THOSE WHO SUPPORT US!!

Business Partner Applications Available At: WWW.CAFDA.NET

We invite our business partners to submit educational information to be included in this Bulletin for district commissioners and chief officers if you have information on new products you wish to showcase or is educational and informative for fire districts, please submit it and we will use it in this Bulletin under the appropriate heading.

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The Capital Bulletin is reaching well over 400+ fire district members and now other members of the fire service on a regular basis. Since the Capital Area Association covers an area the size of Connecticut it is difficult to meet in person to exchange information and ideas.

This is a service of the Capital Area Association through the effort of Tom Rinaldi who can be reached at tom@rinaldi1.com for comments or content contributions are always welcome.

YOU CAN BECOME AN INDIVIDUAL MEMBER OF THE CAPITAL AREA ASSOCIATION!

The Capital Area Association has voted to amend its By-laws to allow both individual and regional or county Fire District Associations to join. The updated By-laws are posted to the CAFDA.NET website.

Individual membership fee will be \$50 annually, fire district association fees will be \$300 annually.

Download THE APPLICATION available on the home page at CAFDA.NET

MEMBERSHIP IN THE CAPITAL AREA FIRE DISTRICTS ASSOCIATION (CAFDA)

Would you like to join Capital Area Fire Districts Association along with 76 members in 10 counties? Individuals, fire district associations, fire protection districts and Village departments are all eligible for membership.

Annual dues (January 1st to December 31st) shall be as follows and shall be based on the annual budget of the Fire District/Organization;

\$0 to \$200,000:	\$50
\$200,001 to \$400,000:	\$100
\$400,001 to \$600,000:	\$200
\$600,001 plus:	\$300

Individuals \$50.00 or Other County or Regional Associations \$300 annually.

Business Partners: \$100.00 annual member fee

If You, Your Fire District or Department is not a Member of CAFDA You Can be?

Individuals can be members of CAFDA. The annual membership fee is \$50, which will provide you access to this Bulletin, attendance at meetings and social gatherings. Provides networking with other fire district officials and a source of the constant barrage of information related to today's fire service.

FOR A MEMBERSHIP APPLICATION OR A BUSINESS PARTNER APPLICATION GO TO THE FOLLOWING LINK:

<https://cafda.net/membership-info/>

CAFDA UPCOMING TRAINING AND MEETING CALENDAR

The following calendar, while tentative, provides our members and participants some insight into the planned activities to be provided locally to our membership and other fire district participants for '23, '24 and '25. We hope you will join us on this journey to provide reasonably priced, quality training in a local setting for your convenience.

For General Membership meetings food is served 1 hour prior to the start time of the meeting, at 6pm, meetings begin promptly at 7PM

CURRENT CAFDA CALENDAR

Capital Area Meetings/Seminars/Trainings/Conference Dates (As of 1/3/2024 - Subject to Change)				
Day/Date	Time	Type	Location	Notes
2024				
Thursday, July 11, 2024	7:00 PM	Board of Directors Meeting	Clifton Park	
Friday, August 9, 2024	1:00 PM	SARATOGA DAY AT THE RACES	Saratoga Race Course	NYRA Day at the Races! Picnic Tables at the Paddock
AUGUST NO MEETING				
Thursday, September 12, 2024	7:00 PM	General Membership Mtg.	Clifton Park	
Thursday, October 10, 2024	7:00 PM	General Membership Mtg.	Clifton Park	Officers/Director Nominations
Saturday, November 2, 2024	8:00 AM	Fall Workshop	Verdoy	
Thursday, November 14, 2024	7:00 PM	General Membership Mtg.	Clifton Park	Officer/Director Elections
DECEMBER NO MEETING				
2025				
Saturday, January 4, 2025	9:00 AM	General Membership Mtg.	Clifton Park	Organizational/Morning Meeting

2025 DRAFT CAFDA CALENDAR

Capital Area Meetings/Seminars/Trainings/Conference Dates (As of 5/8/2024 - Subject to Change)				
2025				
Saturday, January 4, 2025	9:00 AM	General Membership Mtg.	Clifton Park	Organizational/Morning Meeting
Saturday, February 1, 2025	8:00 AM	Commissioner Training	Averill Park	Snowdate - Sunday, February 2, 2024
Thursday, February 13, 2025	7:00 PM	General Membership Mtg.	Clifton Park	
		Financial Training for Fire District Officials		TBD
Saturday, March 1, 2025	8:00 AM	Commissioner Training	Clifton Park	Snowdate - Sunday, March 2, 2025
Saturday, March 8, 2025	5:00 PM	Officer Installation	Century House	
Thursday, March 13, 2025	7:00 PM	General Membership Mtg.	Clifton Park	
Saturday, March 29, 2025	8:00 AM	Commissioner Training	Berkshire FD	Snowdate - Sunday, March 30, 2025
Saturday, April 5, 2025	8:00 AM	Commissioner Training	Warrensburg FD	Snowdate - Sunday, April 6, 2025
Thursday, April 3, 2025	7:00 PM	Board of Directors Meeting	Clifton Park	
Thursday, April 10 - Saturday April 12, 2025		CAFDA Conference	Fort William Henry Conference Center	Lake George
Thursday, May 8, 2025	7:00 PM	General Membership Mtg.	Clifton Park	
Thursday, June 12, 2025	7:00 PM	Board of Directors Meeting	Clifton Park	
Thursday, July 10, 2025	7:00 PM	Board of Directors Meeting	Clifton Park	
Friday, August 8, 2025	1:00 PM	Membership Activity	Saratoga Race Course	NYRA Day at the Races!
NO MEETING				
AUGUST				
Thursday, September 11, 2025	7:00 PM	General Membership Mtg.	Clifton Park	
Wednesday, October 8, 2025	7:00 PM	General Membership Mtg.	Clifton Park	Officers/Director Nominations
Saturday, November 1, 2025	8:00 AM	Fall Workshop	Verdoy	5 Saturdays in November
Saturday, November 8, 2025				
Thursday, November 13, 2025	7:00 PM	General Membership Mtg.	Clifton Park	Officer/Director Elections
DECEMBER NO MEETING				
2026				
Saturday, January 3, 2026	9:00 AM	General Membership Mtg.	Clifton Park	Organizational/Morning Meeting

OSHA INFORMATION SUPPLEMENT

PROVIDED AS A SERVICE FROM THE CAPITAL AREA FIRE DISTRICT'S
ASSOCIATION - CAFDA

NEWEST INFORMATION ALWAYS AT THE TOP WITH RED ARROW

CORRECTION: *In The United States There Are Approximately 675k Volunteer Firefighters, Yet There Have Been Only Approximately 3000+ Comments To The OSHA Portal!!!!*

 ****THIS WEEK'S NEWEST ITEMS PRECEDED BY THE RED ARROW**

- 4,000 comments have been entered in the OSHA Comment Portal to date.
- The last 40 pages is the meat and potatoes of the proposed federal standard.

Notice in the Federal Register Regarding the Public Hearing-Your Opportunity to Testify!!

DEPARTMENT OF LABOR Occupational Safety and Health Administration 29 CFR Part 1910 [Docket No. OSHA-2007-0073] RIN 1218-AC91 Emergency Response Standard

AGENCY: Occupational Safety and Health Administration (OSHA), Labor.

ACTION: Proposed rule; notice of informal hearing.

SUMMARY: OSHA is scheduling an informal public hearing on its proposed rule "Emergency Response Standard." The public hearing **will begin November 12, 2024, at 9:30 a.m. Eastern Time (ET)**. The proposed rule was published in the Federal Register on February 5, 2024.

INFORMAL PUBLIC HEARING:

The hearing will be held virtually and will begin November 12, 2024, at 9:30 a.m. ET. If necessary, the hearing will continue from 9:30 a.m. until 4:30 p.m., ET, on subsequent weekdays.

Additional information on how to access the informal hearing will be posted at <https://www.osha.gov/emergencyresponse/rulemaking>.

To testify or question other witnesses at the hearing, interested persons must electronically submit a Notice of Intention to Appear (NOITA) on or before September 27, 2024.

In addition, those who request more than 10 minutes for their presentation at the informal hearing and those who intend to submit documentary evidence at the hearing must submit the full text of their testimony, as well as a copy of any documentary evidence, no later than October 18, 2024.

ADDRESSES:

Notice of Intention to Appear (NOITA). A NOITA must be submitted electronically at: <https://www.osha.gov/emergency-response/rulemaking>. Follow the instructions online for making electronic submissions.

Those who file NOITAs must also submit electronic copies of all documents that they intend to use or reference during their testimony.

Information about how and when to submit these materials will be provided at the time of registration.

Instructions: All submissions must include the agency's name and the docket number for this rulemaking (Docket No. OSHA-2007-0073). All comments, including any personal information you provide, are placed in the public docket without change and may be made available online at <https://www.regulations.gov>. Therefore, OSHA cautions commenters about submitting information they do not want made available to the public, or submitting materials that contain personal information (either about themselves or others), such as Social Security Numbers and birthdates.

[NOTE: YOU CAN TESTIFY VERTUALLY AS AN INDIVIDUAL, AS A DEPARTMENT, OR AS AN INTERESTED ORGANIZATION]

Tell Congress About Your Concerns Regarding OSHA's Proposed Emergency Response Standard

August 27, 2024

The effort to spread awareness about how the Occupational Safety and Health Administration's (OSHA) proposed Emergency Response Standard could harm volunteer fire departments continues. In addition to encouraging volunteer responders to submit public comments and testimony to OSHA regarding this standard, the National Volunteer Fire Council (NVFC) has been active in alerting Congress to the issues.

With the NVFC's support, Congress has taken a number of actions to weigh-in on the proposed standard, including the following:

- The House Homeland Security Committee's Subcommittee on Emergency Management and Technology held a hearing on OSHA's proposed Emergency Response Standard on June 4. The NVFC had a witness testify at this hearing.
- The House Education and Workforce Committee's Subcommittee on Workforce Protections held a hearing on OSHA's proposed Emergency Response Standard July 24. The NVFC had a witness testify at this hearing.
- In May, Rep. Golden and Rep. Desposito co-led a letter with 40 other members of Congress (29 Republicans, 13 Democrats total) asking OSHA to make the proposed standard more scalable for volunteer firefighters.
- In June, Education and the Workforce Committee Chairwoman Foxx led a letter with 23 other Republican Members of Congress asking Acting Secretary of Labor Julie Su to exempt volunteers from the emergency response standard.
- In July, the Senate and House Members from the Arkansas Congressional delegation sent a letter to Acting Secretary Su requesting that OSHA rescind the proposed rule.
- In August, Sen. Moran and Sen. Coons led a letter with 7 other Senators (7 Republicans, 1 Democrat, 1 Independent total) asking Acting Secretary Su to exempt volunteers from the Emergency Response Standard.
- Senator Boozman sponsored an amendment that was included in the mark-up of the Senate's FY 25 Labor, Health, and Human Services Appropriations Bill that encourages OSHA to conduct listening sessions and outreach with stakeholders to fully understand the impact of new requirements on volunteer fire departments.

Though OSHA's proposed Emergency Response Standard is an Executive Branch action and Congress does not vote on the adoption of the final standard, it is important to continue to make Congress aware of the potential negative impacts of this standard due to their function of overseeing and funding OSHA. **Share the NVFC's [advocacy one-pager](#) with your Senators, Representative, or their staff so that they understand the issues and impact.**

Visit the NVFC's [OSHA Standard landing page](#) for additional resources to assist you with understanding the proposed Emergency Response Standard and information about testifying during OSHA's November public hearing.

NEW WEEK OF AUGUST 24TH!!

OSHA has been slowly adding the comments to the portal. It has become clear that they are filtering these comments and adding them in groups. Some have been labeled as "mass mailings" and other that also contain similar language have not. *Organized labor has contributed several comments as well as groups that would benefit financially from the rule. **The biggest smoking gun to me has been the comment from NFPA asking that the incorporated by reference standards be removed.*** Also, of particular interest to this group would be the comment posted by DHES and OFPC. We will schedule a Zoom meeting for next week.

I am attaching a number of comments that I feel you should be aware of and may not have the time to plow through 3K comments to see them.

The common themes that I am gathering from these comments so far are:

1. The process was flawed in how it was conducted and communicated.
2. The rule is arbitrary and capricious, convoluted, and exhaustive. Therefore, it is not understood.
3. THE NFPA standards should not be incorporated by reference.
4. Large, **Unfunded mandates.**
5. Not economically or technically feasible.
6. **Overreach by OSHA.**
7. Did not follow the full negotiated rule making process.
8. **Will have several legal challenges.**

9. Will treat workers differently because of geographic location instead of common hazards faces.
- 10. Process was unfairly supported and driven by organized labor groups**
11. Will force some organizations to close their doors leaving the community at risk.
- 12. Is primarily supported by those that will benefit financially from it.**
13. The consensus is that we applaud the efforts of improving safety but the current document, as written, is not the answer.
14. We would be stronger as one voice moving forward.



NYS Homeland Security.pdf



Illionois Fire Dsistricts.pdf



IAFF Final Comments.pdf

COMMENTS FROM NFPA..HIGHLIGHTED SECTIONS OUT OF AN 11 PAGE LETTER!!

NFPA applauds OSHA for opening this national dialogue on how to protect first responders from a variety of occupational hazards. NFPA shares that goal and has played a significant role in advancing first responder safety over the last century. Nevertheless, it is important to note that as a general policy, **NFPA does not request incorporation by reference of any of our codes and standards. While NFPA has been involved with OSHA over the course of many years and through several Administrations considering rulemakings, NFPA had no specific recent role in putting this Notice of Proposed Rulemaking together, and NFPA did not suggest to OSHA that it should undertake this activity.**

NFPA understands that OSHA has proposed to reference NFPA’s codes and standards because they are widely recognized as the best in the world and thus are widely used in the United States and elsewhere. Our technical committees, comprised of 9,000 volunteer members, consider every submitted input to prepare standards that address the latest in technology, research, and other relevant information. We are proud that our codes and standards serve the safety goal of protecting emergency responders. The NFPA Fire & Life Safety Ecosystem (<https://www.nfpa.org/about-nfpa/nfpa-fire-and-life-safetecosystem>) identifies the components that must work together to minimize risk and help prevent loss, injuries, and death from fire, electrical, and other hazards. We are confident that, throughout the years, our world-class codes and standards have saved firefighters’ lives, prevented injuries, and enhanced first responders’ effectiveness in aiding their communities. The development, use, and adherence to current codes and standards is a key part of the Ecosystem. The Ecosystem also relies on prepared first responders. The process of preparing first responders depends on continuous recruitment, training, and supplies of the best equipment. This is one of the reasons that NFPA strongly supported the reauthorization of the Assistance to Firefighters (AFG) and the Staffing for Adequate Fire and Emergency Response (SAFER) grants managed by the Federal Emergency Management Administration, which was recently enacted as Public Law 118-67. We continue to advocate for expanded funding for both critical grant programs. A decision made by a government, or by a for-profit or non-profit entity, to use a particular code or standard furthers the goal of enhancing safety. In the case of this Emergency Response Standard, as in the case of so many others, the entity making the incorporation decision must consider the appropriate implementation schedule and compliance plan. **We are sensitive to the concerns that many in the fire service, especially smaller volunteer fire companies, have expressed about the expense of meeting the OSHA proposal and how quickly the requirements would be mandated. At the macro level, we know that investments in safety are almost always worthwhile. We trust that OSHA will determine the appropriate implementation schedule should this proposed rule be finalized. Parallel to whatever OSHA decides, our nation must continue to invest in AFG, SAFER, and other efforts to fund our volunteer and career first responders.**

However, recent legal developments create a risk that OSHA’s continued use of incorporation by reference could frustrate NFPA’s ability to continue developing world-class safety standards. NFPA therefore requests (1) that OSHA refrain from incorporating NFPA’s standards by reference in the proposed rule and that OSHA instead provide in the text of the rule that NFPA’s standards are a benchmark for gauging compliance with the regulations and do not impose any binding legal obligations; (2) that OSHA explicitly acknowledges, in the rule, NFPA’s copyright interests, knowing those interests also serve the agency and the public by ensuring the independence and sustainability of standards development; and (3) ensure through the rule that the public knows that NFPA posts its standards online for free read-only access.

The recent court decision, and the importance of NFPA's copyrights to OSHA's work, necessitate a different approach to OSHA's use of NFPA's standards. NFPA requests that OSHA not incorporate by reference its standards in the proposed rule. Instead, NFPA requests that OSHA refer to its standards in the text of the proposed rule as one benchmark of compliance with the regulations and **expressly provide in the rule that NFPA's standards are guidance and not binding.**

NFPA requests that OSHA use a similar approach for the NFPA standards it currently proposes to incorporate by reference in its rule. For example, the proposed rule incorporates by reference NFPA 1910, Standard for the Inspection, Maintenance, Refurbishment, Testing, and Retirement of In-Service Emergency Vehicles and Marine Firefighting Vessels. The proposed rule requires organizations and employers to "[i]nspect, maintain, and service test aerial devices on vehicles, to ensure they are safe for use, as specified by the manufacturer, or to a standard at least as equivalent to NFPA 1910 (incorporated by reference see § 1910.6)." 89 Fed. Reg. at 8,019. **OSHA could instead draft this rule to require that there be inspection, maintenance, and servicing of the devices "to ensure they are safe for use." OSHA should then further expressly provide in the text of the rule that NFPA 1910 is one way of ensuring safe use of test aerial devices on vehicles but does not create any binding obligations.** This approach would ensure safety, while preserving NFPA's copyright in NFPA 1910. For each standard that OSHA's proposed rule incorporates by reference, NFPA would welcome the opportunity to work with OSHA on ways to ensure that the rule achieves the agency's safety objectives without using incorporation by reference.

PUBLIC HEARING SCHEDULED TO BEGIN ON NOVEMBER 12TH

The Occupational Safety and Health Administration (OSHA) has published a Notice in today's Federal Register (see, <https://www.govinfo.gov/content/pkg/FR-2024-07-23/pdf/2024-16126.pdf>) announcing that it is **scheduling an informal public hearing on its proposed "Emergency Response Standard."** The public hearing will be held virtually and is scheduled to begin Tuesday, November 12, 2024, at 9:30 a.m. (ET) and will continue on subsequent weekdays (as necessary). (Note: Monday, November 11, 2024, is a federal holiday.)

OSHA's proposed Emergency Response rule was published in the Federal Register on February 5, 2024 (see, [2023-28203.pdf \(govinfo.gov\)](https://www.govinfo.gov)), and the public comment period closed yesterday, July 22, 2024.

Additional information on how to access OSHA's informal hearing will be posted on OSHA's Emergency Response webpage at <https://www.osha.gov/emergencyresponse/rulemaking>.

To testify or question other witnesses at the hearing, interested persons must electronically submit a Notice of Intention to Appear (NOITA) to OSHA on or before September 27, 2024. In addition, those who request more than 10 minutes for their presentation and those who intend to submit documentary evidence must submit the full text of their testimony, as well as a copy of any documentary evidence, to OSHA no later than October 18, 2024.

Please see OSHA's Federal Register Notice and Emergency Response webpage for full information. We will plan to discuss this issue at our next regular Small Business Labor Safety (OSHA/MSHA) roundtable, that is tentatively scheduled for Friday, September 20, 2024.

From Dave Denniston – What's Next?

Thank you for participating in the efforts to voice our opinion over the proposed OSHA 1910.156. Now that the comment period has ended, the need to meet weekly has passed. I am 100% convinced that the efforts we put forth as a group made an impact. When you look at the comments posted in the portal, they had our fingerprints all over them. If we had not done what we did here in NY, I firmly believe the comment period would have ended back in May with very little input and OSHA would be full speed ahead with the final rule. At least now we opened the door for further comment, in person, and then again written, and have alerted our elected officials to the concerns.

I would like to propose that we push our meeting schedule back to the first Thursday of every month at noon to discuss any updates. If there is a need in-between the regular meeting date, we could call a special meeting.

SOME STATS FROM OUR EFFORTS:

We had 2006 live webinar views with another 464 watching the recordings.

We received 4116 signatures on the petition submitted to OSHA.

We held 6 in person sessions with over 700 participants.

NEXT STEPS:

1. We need to pull the blue-ribbon panel together to discuss the proposed rule and offer alternatives. I have only received two candidates and believe we should have around 10-12 people in that group.
2. We need to prepare material to help guide people on how to deliver an effective in-person testimony and start looking for people to participate.
3. I believe we should ask every department to elect or appoint someone to participate as a representative of their department. These folks would attend a few web meetings to learn more, understand the process and share information with their department.
4. We need to stay engaged with our elected officials and keep them involved in this process.
5. Is there anything else that we are missing here?

Again, Thank you for your help and interest on this important topic. I look forward to our next conversation on Thursday, August 1ST AT 12pm. By then we should have a good feel for what the public comment response looked like.

****The New OSHA Rule You Must Pay to Learn**

The Center for Individual Rights

The Occupational Safety and Health Administration (OSHA) has proposed a new rule that would impose steep compliance costs on local volunteer fire departments around the country and make them pay substantial fees just to learn what the regulations require. The Occupational Safety and Health Act (OSH Act) created a federal agency with an extremely vague mandate to establish nationwide workplace safety standards with almost no congressional guidance. Yet OSHA's most recent proposal, the Emergency Response Standard (ERS) manages to extend this already broad power even further with sweeping workplace standards that even reach volunteer organizations.

If adopted, the ERS would impose federal safety standards for emergency response services, including local, volunteer fire departments, that purport to preempt and displace existing state-enforced safety regulations. ***Many of the affected volunteer fire departments lack adequate funding (relying as they do upon voluntary support) and cannot afford to overhaul their standards to comply with new federal rules, which larger departments in metropolitan areas can more easily manage.***

UNCONSTITUTIONAL REGULATION

CIR filed a comment with OSHA explaining that the ERS likely violates both federal law and several different provisions of the Constitution. To start, the OSH Act provides such broad discretion to OSHA as to amount to an unconstitutional delegation of legislative authority. Moreover, the sweeping reach of the ERS, a nationwide overhaul of safety regulations for such a wide swath of emergency responders, vastly exceeds the limited guidance Congress did provide.

Worse yet, even fire departments that do not object to complying with the rule will have to pay substantial fees just to learn what it actually requires. Rather than clearly articulating the new safety standards on a freely accessible website, OSHA has incorporated by reference more than 20 consensus standards published by different private organizations. Just to download, print, or copy these standards, organizations must pay steep fees. But to synthesize them will require hiring expert consultants.

This approach violates federal law—the Freedom of Information Act component of the Administrative Procedure Act, which requires that an agency make all substantive rules of general applicability available to the public. It also violates the Due Process Clause of the Constitution, which guarantees citizens the right to fair notice about governing law.

The text of the OSH Act poses another problem; it does not apply to volunteer organizations at all. The terms of the law are expressly restricted to employees, i.e. people who are paid to work. ***Yet due to complex state regulations that treat some volunteers as employees for the purpose of certain state benefit programs, the ERS is unlawfully sweeping in volunteer organizations.***

This case is a vital reminder of the importance of establishing firm limits on federal power to the defense of individual rights.

TO READ CIR'S 15 PAGE COMMENT TO OSHA OPEN AT THIS LINK:

<https://cafda.net/wp-content/uploads/2024/07/CIR-comment-OSHA-ERS.pdf>

This is a Link to the 18-page letter to Douglas Parker, Assistant Secretary for Labor for OSHA

<https://cafda.net/wp-content/uploads/2024/07/NYS-United-Concerns-OSHA-Response-FINAL-07.16.24-DD.docx>

This is a must-read item for all concerned about the proposed update to the OSHA Standard for Emergency Response. This was filed on behalf of the NYS United Concerns Group who participate in the zoom meetings on a weekly basis. **Please take the time to read this important document.**

[Excellent Docket Response from South Carolina Firefighters Association](#)

Open the Document at This Link:

<https://cafda.net/wp-content/uploads/2024/07/Docket-Comment-7-8-SCSFA-Response.docx>

[Joint Letter to OSHA from NYS Association of Counties, NYS Conference of Mayors, and the NYS Association of Towns](#)

Open the Document at This Link:

<https://cafda.net/wp-content/uploads/2024/07/NYCOMNYSACAOTjointletter.pdf>

[What Are Your Pain Points](#)

PAIN POINT FINANCIAL....

OSHA's Proposed Rule:

OSHA's proposed rule would require NFPA 1582 Medical Exams be administered to all firefighters either annually or bi-annually. OSHA estimates the cost of a required medical exam to be \$620 each.

The Pain Point: A small-town fire department with two dozen members would have to find funding for a dozen medical exams each year for a total cost of \$7440.

Tell OSHA: Tell OSHA what your annual budget is and how you would have to raise \$7440. For example, if your department relies upon fundraising, tell OSHA how many extra spaghetti dinners you'd need to sell each year to raise \$7440.

Assuming a profit of \$8 per dinner, you need to sell 930 spaghetti dinners each year to pay for medical exams. How many people live in your town – does everyone need to buy two dinners? Explain this to OSHA.

OSHA PAIN POINTS – ADDITIONAL, OSHA'S PROPOSED RULE:

The proposed OSHA rules incorporate by reference twenty-one NFPA standards. This adds about 3000 pages of text to the rules.

The Pain Point: Small fire departments don't have the legal or administrative capabilities to read, interpret, and comply with this much new regulation.

Tell OSHA: Tell OSHA that there is no administrative or legal staff available at your fire department to read, interpret, and comply with 3000 pages of NFPA standards. Tell OSHA how small or non-existent your administrative staff and budget is.

OSHA's Proposed Rule:

The proposed OSHA rules will require all fire chiefs to have NFPA Fire Officer 3 training.

The Pain Point: Half of the state fire training academies don't offer Fire Officer 3 training and there is no practical way to get the training. Even in states that offer the training, it will typically require unpaid volunteer chiefs or part-time chiefs to take classes on weekdays when they have to take time off from their full-time jobs or travel long distances to night and weekend classes.

Tell OSHA: Tell OSHA that Fire Officer 3 training isn't available or readily available to your department and why.

OSHA's Proposed Rule:

The proposed OSHA rules incorporate by reference twenty-one NFPA standards.

The Pain Point: NFPA standards are not readily available, and this makes commenting on them difficult. You have to purchase them for \$149 each or purchase a subscription to access them for \$12/month.

Tell OSHA: Tell OSHA that before they close the comment period and make these standards law, OSHA needs to provide free copies of the these standards to the public.

OSHA's Proposed Rule:

The proposed OSHA rules will require all fire chiefs to have NFPA Fire Officer 3 training.

The Pain Point: Half of the state fire training academies don't offer Fire Officer 3 training and there is no practical way to get the training. Even in states that offer the training, it will typically require unpaid volunteer chiefs or part-time chiefs to take classes on weekdays when they have to take time off from their full-time jobs or travel long distances to night and weekend classes.

Tell OSHA: Tell OSHA that Fire Officer 3 training isn't available or readily available to your department and why.

OSHA's Proposed Rule:

The proposed OSHA rules use the 2022 Firehouse Magazine Run Survey as the basis for defining the scale and financial resources of the volunteer fire service.

The Pain Point: The Firehouse Magazine Run Survey is created for entertainment purposes and should not be used the way OSHA has used it to create regulations. The Firehouse Magazine Run Survey is a small set of data without knowing who or why the data was created, except for fun and to see your department named in the magazine.

The Firehouse Magazine Data says that the average volunteer fire department:

- Has a budget of \$
- Responds to ____ emergency calls per year
- Has ____ volunteer members

Tell OSHA: Tell OSHA that it's data about the size and financial resources of volunteer fire departments is wrong. Tell them about your department budget, the size of your town, how many calls you go to, and why this is so different than the Firehouse data. Tell them about the other departments in your area.

OSHA's Proposed Rule:

The proposed OSHA rules will incorporate by reference twenty-one NFPA standards.

The Pain Point: NFPA standards are not required to be based upon data or scientific evidence. NFPA standards are the collective opinions of the committees that write them. Unlike OSHA, NFPA standards are not required to address only significant risks to the health and safety of firefighters. Making these standards into law reaches way beyond the mission of OSHA.

Tell OSHA: Tell OSHA that their use of NFPA standards is arbitrary, because many of the standards themselves, or parts of the standards are arbitrary.

1. "Have you had time to completely read and analyze the new proposed OSHA standard 1910.156 rule and the effects it would have on your organization? If not, click here and tell OSHA that 165 days has not been adequate to review a document that took them years to write."
2. "Do your captains and lieutenants hold Fire Officer I training? Do your assistant chiefs hold Fire Officer II training? The new proposed OSHA 1910.156 rule would require this. Click here and tell OSHA why this would be problematic for your organization."
3. "Does your fire department have an annual budget of less than 1.7 million dollars? OSHA is under the assumption that the average fire department budget for volunteer or combination depts is 1.7 million dollars. If your budget is less, click here, and tell OSHA what your budget is and that you believe their data is inaccurate."
4. "OSHA believes the impact of the proposed 1910.156 rule would be less than 1%. Is this true for you? Several fire departments have analyzed the proposal and this would increase their budgets by over 40%. Click here and tell OSHA why a substantial tax increase is not feasible"
5. "Does your organization do weekly vehicle inspections or within 24 hours of each run? That's what the proposed OSHA 1910.156 rule would require. Click here and tell OSHA why that is problematic for your organization."
6. "Do you clearly mark control zones for every emergency incident to establish a cold zone, warm zone, hot zone and no entry zone? The proposed OSHA 1910.156 rule would require this. If this would be problematic for your organization, click here and tell OSHA why this is not feasible."
7. "Do you provide annual physicals for your firefighters that include comprehensive behavioral health evaluations, skin cancer screenings, and bi-annual mammograms for firefighters over 40? The Incorporation of NFPA 1582 in the proposed OSHA standard 1910.156 rule would require this. If you are not currently performing physicals at this level, click here and tell OSHA why that would be problematic for your organization."

Commented [PL1]: To be consistent with NFPA I would use "Fire Officer I and "Fire Officer II"

Commented [PL2]: The fire chief in me dozed off during this one. Too wordy. I took a shot at more concise approach.

Commented [PL3]: Tried cleaning this one up too

Commented [PL4]: This one is not accurate so I cleaned it up

Commented [PL5]: Not accurate re-worded it

8. "Does your organization have \$620 per member for annual or bi-annual medical exams? If not, click here and explain to OSHA what your budget is for medical exams."
9. "Did you know the proposed OSHA rule incorporates by reference twenty-one NFPA standards, which are NOT free to comment on. Click here to tell OSHA to give free copies of these standards to the public."

Pain Points to Address

PAIN POINT #1

OSHA's Proposed Rule: All Emergency Service Organizations shall conduct a community or facility vulnerability and risk assessment for its service area, for the purpose of establishing its standards of response and determining the ability to match the community or facility's risks with available resources.

The Pain Point: Does your fire department conduct hazard assessments (or pre-plans) to all commercial businesses? Does your department conduct hazard assessments to all vacant structures? Does your department pre-plan facilities that are subject to reporting requirements under the Emergency Planning and Community Right-to-Know Act (EPCRA)? Does your department have an incident plan for each of the hazard assessments for an emergency incident? If not, then you will not be compliant with the OSHA Proposed Ruling.

Tell OSHA: This is economically infeasible and there is no local funding for the hazard assessments of all buildings in your area. Let OSHA know what the cost would be to add one or more employees to be able to comply with conducting the yearly assessments. Be blunt – tell them you have no administrative staff to do this.

PAIN POINT #2

OSHA's Proposed Rule: OSHA's inclusion of NFPA 1582: Standard on Comprehensive Occupational Medical Program for Fire Departments, which requires annual medical evaluations proving fit for duty.

The Pain Point: The pain point comes in finding a doctor who can perform and meet the requirements of the standard, the cost to the fire and emergency services department, extra time requirements for a volunteer, and the administrative burden of scheduling and tracking exams.

Tell OSHA: This is economically infeasible. Tell OSHA what your budget is and if you don't have administrative staff to schedule and track medical exams. Tell OSHA if you are in a rural area with poor access to occupational medical care or are unable to find a doctor who can perform all the requirements found in NFPA 1582 or that are willing to sign off. Tell OSHA about volunteer firefighters traveling hours out of their way to get the physicals or the added costs of having an organization come to the department to perform the physicals. The cost of a NFPA 1582 physical for each member can range from several hundred to several thousand dollars. Tell OSHA what this would cost your department. Tell OSHA about the time constraints with NFPA-compliant physicals – are they only available during the workday when volunteers are working their primary jobs?

PAIN POINT #3

OSHA's Proposed Rule: OSHA is seeking guidance on whether an action level of 15 exposures to combustion products within a year trigger medical surveillance consistent with NFPA 1582 is too high, too low, or an appropriate threshold.

The Pain Point: After each incident, in addition to an incident report, do you record what level of smoke or exposure to combustion products is experienced by every firefighter or officer who responded? If the number per year exceeds 15, or whatever number OSHA determines, are you prepared or capable of placing them under medical monitoring against a baseline physical also required meeting NFPA 1582?

Tell OSHA: There is no defined number of exposures that are determined to be the right number, so just as requiring annual exams is arbitrary and not based on science, so is the number of exposures. Tell OSHA that "exposure to combustion products" is not defined. Ask OSHA does it mean any smoke, such as from a brush fire or burnt bacon on the stove, or does it have to be an IDLH atmosphere?

PAIN POINT #4

OSHA's Proposed Rule: OSHA's Proposed Rule is seeking input on whether the proposed rule should specify retirement ages for personal protective equipment (PPE). Current NFPA standards call for 10 years.

The Pain Point: Are all your firefighters using gear under 10 years of age? Can you afford to replace gear older than 10 years of age?

Tell OSHA: While 10 years seems reasonable for firefighters actively engaged in structural firefighting, do we rule out or discard gear 11 years of age even though it shows minimal signs of wear? How about others who perform support functions, or extrication, etc.? Some firefighters wear the same structural fire helmet for their entire career spanning

20 – 30 years. Is there statistical evidence by OSHA that helmets over 10 years of age are causing head injuries or burns? Gear that is used to run 600 calls per year doesn't have the same wear and tear as gear that is used to run 85 calls per year.

PAIN POINT #5

OSHA's Proposed Rule: If approved, the new OSHA rules would require your fire department to conduct annual fitness for duty testing, essentially an annual physical ability test that includes dragging dummies, hitting targets with axes, and forcing a door or breaching a wall.

The Pain Point: Most small fire departments have no training props. They have no facility for conducting a fitness for duty test, especially one that meets many legal requirements of consistency and fairness for all participants. This means hiring vendors to do the test or having firefighters drive hours to a test.

Tell OSHA: If your fire department can conduct a physical ability test each year. Tell them how far away the nearest facility for a test is. Tell them what props or facilities you have and don't have. Tell them your budget and what this will cost.

PAIN POINT #6

OSHA's Proposed Rule: The proposed OSHA rules will require all personnel treating a patient in the back of an ambulance to wear a harness so they are belted and can move around.

The Pain Point: Harness systems for EMS in the back of the ambulance are rare. These systems have not been perfected and there is no standard for them. Ambulances would have to be retrofitted.

Tell OSHA: If you have an ambulance, tell OSHA if you have a harness system, or if your seatbelts don't allow for treating patients. Tell OSHA that there is no industry standard or agreed-upon technology for a harness that allows freedom of movement for treating patients. Tell OSHA how long it will be before you can purchase a new ambulance with a harness (when they become available), or what it would take to retrofit your current ambulances.

PAIN POINT #7

OSHA's Proposed Rule: At least 21 NFPA standards are incorporated in OSHA's proposed rules.

The Pain Point: While NFPA standards are available to view for free online, printed copies of these standards are not free. An \$11.99 a month NFPA membership would be required to print these standards, plus the cost of ink and paper. The NFPA also sells printed copies of their standards. For example, a printed copy of NFPA 1021 costs \$149.00. This limited access to printed NFPA standards is particularly problematic since many volunteer fire departments in rural areas lack reliable internet access or funding to purchase printed copies.

Tell OSHA: Let OSHA know what your department budget is and the burden it would be to purchase NFPA standards. Also let OSHA know if your department does not have reliable internet access to view these standards. It is wrong for OSHA to mandate standards that are not reasonably available to view for free.

PAIN POINT #8

OSHA's Proposed Rule: The proposed OSHA rules incorporate by reference 21 NFPA standards. This adds about 3000 pages of text to the rules.

The Pain Point: Small fire departments don't have the legal or administrative capabilities to read, interpret, and comply with this much new regulation.

Tell OSHA: Tell OSHA that there is no administrative or legal staff available at your fire department to read, interpret, and comply with 3000 pages of NFPA standards. Tell OSHA how small or non-existent your administrative staff and budget is.

PAIN POINT #9

OSHA's Proposed Rule: All fire officers/chiefs must be trained to NFPA 1021, Standard for Fire Officer Professional Qualifications.

The Pain Point: Much of the required information in NFPA 1021 courses is well beyond the scope of the small department. Can your fire department provide this level of training to all your current and future officers? Does your budget support this? Are there classes available on nights and weekends? How far will your officers have to travel?

Tell OSHA: This training is a one size fits all approach and contains material that is often not relevant to small volunteer fire departments. Due to the time constraints and pressures volunteers face, any additional training must be tailored to the risks small volunteer departments face. Additional training that is not relevant would create additional burdens

on volunteers and additional barriers to joining and remaining in the fire service, exacerbating ongoing recruitment and retention issues in the fire service.

PAIN POINT #10

OSHA's Proposed Rule: All fire chiefs must receive NFPA 1021 Fire Officer III training.

The Pain Point: The Fire Officer III certification is only offered in approximately 25 states. Chief officers would face significant hardship in getting the required training and certification. Unpaid volunteer chiefs or part-time chiefs would be required to take classes on weekdays when they have to take time off from their full-time jobs, or they would have to travel long distances to night and weekend classes.

Tell OSHA: The cost of accessing NFPA 1021 Fire Officer III training will place a financial burden on volunteers. In most cases, this class is not offered on a schedule that is friendly for volunteers. Many volunteer officers will be required to travel to a state where they can receive training, taking time away from their primary job and requiring funds that are often not available. All required training must be widely accessible and, when possible, virtually available.

5 MORE PAIN POINTS TO ADDRESS

Let OSHA know how the proposed Emergency Response Standard will impact your department! Here are five 'pain points' that you can address in your comments.

PAIN POINT #16

OSHA's Proposed Rule: The proposed OSHA standard uses the 2022 Firehouse Magazine Run Survey as the basis for defining the scale and financial resources of the volunteer fire service.

The Pain Point: The Firehouse Magazine Run Survey data is not a proper reflection of the fire service because of its small sample size, and it likely presents an inflated view of the financial condition of the volunteer fire service because departments with the least resources are typically not the departments that are going to take the time to submit their budget data to a magazine. According to OSHA per the Firehouse Magazine Run Survey data, the average volunteer department's annual revenue is \$291,703.

Tell OSHA: Tell OSHA that its data about the size and financial resources of volunteer fire departments is wrong. Tell them about your department's budget, the size of your town, how many calls you go to. Be aware that comments you submit to OSHA are publicly available.

PAIN POINT #17

OSHA's Proposed Rule: OSHA estimates that the annual cost for a volunteer fire department to comply with this standard would be approximately \$14,000.

The Pain Point: Due to the costs of physicals, needed administrative staff, and equipment, among other provisions within the proposed standard, the NVFC believes the cost of compliance would be much greater.

Tell OSHA: What your department's budget is and whether you could absorb this expense. If possible, tell OSHA what you think it would cost your department to implement this proposed Emergency Response Standard. You can use this one pager to assist you in understanding some of the requirements in OSHA's proposed standard.

PAIN POINT #18

OSHA's Proposed Rule: In accordance with manufacturer recommendations for apparatus maintenance, personnel who are certified Emergency Vehicle Technicians would be required to perform daily, weekly, monthly, semi-annual, and annual inspections on apparatus. Annual inspections include weight verification, an inspection of all chassis components, and brake systems.

The Pain Point: Does your department have the personnel to adhere to manufacturer recommended daily, weekly, monthly, semi-annual, and annual inspections on apparatus. Do you have the capacity to take your apparatus offline for such inspections? Do you have access to equipment that could weigh your apparatus annually?

Tell OSHA: Explain to OSHA the apparatus and staffing that your department has and whether you have the capacity or access to equipment to comply with recommended manufacturer inspections, like annual truck weight verification.

PAIN POINT #19

OSHA's Proposed Rule: This proposed standard would require fire departments to create, annually review, and annually update a written community emergency response plan, pre-incident plans for all high or special risk properties, and a written risk management plan for the department. OSHA estimates that one-time setup of these various administrative requirements would take about 92 hours and an additional 43 hours to review annually.

Pain Point: The NVFC believes much more time would be needed to comply with these requirements. Additionally, does your department have the administrative capability and expertise to fulfill these requirements? Are OSHA's estimated hours needed for compliance correct?

Tell OSHA: Whether your department has any administrative staff. Explain to OSHA how many hours it would take your department to fulfill these administrative requirements and whether it would be possible for you to do so at all.

PAIN POINT #20

OSHA's Proposed Rule: The proposed standard would require the establishment of control zones at every emergency incident to identify the level of risk to team members and responders and the appropriate protective measures needed, including PPE. These zones should be no-entry, hot, warm, and cold. These zones would need to be marked in a conspicuous manner, with colored tape, signage, or other appropriate means, unless such marking is not possible.

Pain Point: The establishment and marking of control zones may not be possible at every incident due to the scope of the incident and the personnel available. According to OSHA, what would make such labeling impossible?

Tell OSHA: If it makes sense to establish and label control zones at every incident and if you have the available personnel to do so.

PAIN POINT #21

OSHA's Proposed Rule: OSHA expects that the affected community would be able to allocate the very small additional share of their revenue necessary to permit their fire department to comply with the proposed Emergency Response Standard.

Pain Point: Many departments won't have much of a budget available to comply with this standard. If the department is affiliated with a municipality, it would have to pay a large share of the compliance cost. Most volunteer fire departments serve rural communities with very small budgets that would lack the funds to assist their fire departments with compliance of this standard. Additionally, there are nonprofit departments and departments that self-fundraise that lack access to municipal funds.

Tell OSHA: What your department budget is and whether it would be feasible for your municipality to assist with the funding needed to comply with OSHA's proposed Emergency Response Standard. Explain to OSHA how your department is structured and funded and whether you are affiliated with a municipality.

[Long Island \(NY\) Volunteer Firefighters Push Back on OSHA's New Regulations](#)

LINK TO TV COVERAGE

<https://www.fireapparatusmagazine.com/fire-apparatus/long-island-ny-volunteer-firefighters-push-back-on-oshas-new-regulations/>

[House Subcommittee Testimony](#)

House Homeland Security Subcommittee on Emergency Management and Technology held a hearing on Tuesday morning (June 4, 2024, at 10:00 a.m. ET) on OSHA's proposed Emergency Response rule.

LINK TO THE TESTIMONY GIVEN BY THE WITNESSES HERE:

<https://cafda.net/wp-content/uploads/2024/06/2024-06-04-EMT-HRG-Testimony.pdf>

[OSHA's Move to Improve Safety to Firefighters, EMS Providers, and Technical Search and Rescue Members](#)

LINK TO MOST RECENT ARTICLE IN FIREHOUSE MAGAZINE:

[https://www.firehouse.com/safety-health/article/55056294/oshas-move-to-improve-safety-to-firefighters-ems-providers-and-technical-search-and-rescue-members?o_eid=6778E0229656H9A&oly_enc_id=6778E0229656H9A&rdx.ident\[pull\]=omedal6778E0229656H9A&utm_campaign=CPS240530030&utm_medium=email&utm_source=FH+Newsday](https://www.firehouse.com/safety-health/article/55056294/oshas-move-to-improve-safety-to-firefighters-ems-providers-and-technical-search-and-rescue-members?o_eid=6778E0229656H9A&oly_enc_id=6778E0229656H9A&rdx.ident[pull]=omedal6778E0229656H9A&utm_campaign=CPS240530030&utm_medium=email&utm_source=FH+Newsday)



NVFC CONTINUES TO SOUND ALARM ON PROPOSED OSHA STANDARD AND CLARIFIES IMPACT ON NON-OSHA STATES

May 21, 2024

The National Volunteer Fire Council (NVFC) continues to raise awareness on the Occupational Safety and Health Administration's (OSHA) proposed Emergency Response Standard and offer resources to help first responders take action. On February 5, OSHA published a Notice of Proposed Rulemaking (NPRM) to replace the agency's "Fire Brigades" standard with a proposed new "Emergency Response Standard." This NPRM's publication triggered the beginning of a public comment period that is scheduled to conclude June 21, 2024.

While many of the proposed provisions would be helpful and improve the safety of emergency responders, the proposed standard contains multiple new requirements that would be very burdensome, and in many cases impossible, for volunteer fire departments to comply with. Nothing in this proposed standard is final and this public comment period is your opportunity to explain to OSHA what you believe should be changed in the proposed standard and why. The NVFC has launched a landing page to assist volunteers in understanding and commenting on this proposed standard, which can be accessed [here](https://www.nvfc.org/osha-standard/): (<https://www.nvfc.org/osha-standard/>)

In addition, the NVFC has held several webinars, including two over the past two weeks, to break down the concerns regarding the proposed standards and help responders formulate their comments. These webinars may be viewed [here](https://virtualclassroom.nvfc.org/webinars): (<https://virtualclassroom.nvfc.org/webinars>) The NVFC is hosting a Roundtable Talk on May 23 at 2pm ET with the National League of Cities and the National Association of Counties to highlight areas of mutual concern and provide recommendations on how volunteer departments can collaborate with their local government to express these concerns to OSHA. [Register here](#):

(https://us06web.zoom.us/webinar/register/WN_JXLQL0c5S3acTz9c6US0dA#/registration)

The NVFC has also been raising attention for the proposed OSHA standard in Congress. During the last week, a letter supported by the NVFC has been circulating around the House of Representatives urging OSHA to consider exempting volunteer fire departments from some or all parts of the proposed standard, identify additional areas where financial and logistical burdens could be reduced, and extend the proposed standard's public comment period. The letter is expected to be sent tomorrow, and so far approximately 40 Members of Congress have signed it.

One of the most frequent questions the NVFC has received is how the proposed standard would impact non-OSHA states (refer to [this map](#): at this link <https://www.osha.gov/stateplans> to see which states are OSHA states). The answer is this proposed standard would impact non-OSHA states if adopted as written. The immediate impact on non-OSHA states would be related to volunteer fire departments that are nonprofits and unaffiliated with municipalities. Reading through the NPRM on this proposed standard, it appears OSHA is unaware that such departments exist. It is possible that firefighters in these departments would be covered by this standard if they receive any compensation, regardless of the state they live in.

In addition to the immediate impact, the proposed standard would likely have secondary impacts on non-OSHA states. It could be used as a baseline of compliance for the purpose of seeking insurance and judgments in civil liability in every state.

CONTACT YOUR REPRESENTATIVE AT THIS LINK:

<https://www.voterveice.net/NVFC/Campaigns/115571/Respond>

Additionally, the public comment period for OSHA's proposed standard is ongoing and concludes on June 21. The NVFC encourages all departments to submit comments. Please visit NVFC's OSHA landing page for guidance on submitting comments and other resources at this link: <https://www.nvfc.org/osha-standard/>.

Landing Page with Resources

The NVFC has created a landing to provide resources to help members of the fire and emergency services and the public better understand the issue and submit a public comment by June 21. This includes an outline of the proposed standard, comment guide, and recorded webinars. This page will be updated periodically with new resources and information.

NVFC LANDING PAGE LINK HERE:

<https://gma5qspab.cc.rs6.net/tn.jsp?f=001L6aLm-Ax7THBUrMdNSMphNIFj1WWWXRRzYxdUshoNVzVUkCq2FlyoxhE-Ayblw8OnamjN0BiBpzyC-pPzLiiYEvhxQ9sAxH0UIN-rMeW-UojESkwwKkPDdMRzXK8VXBp->

Sh4YQDWc0PJekSA9BGQCOh6lo_AGI2vqw1b4iSBqWLS=&c=LauWWHLcf9ha42GymhqekGbW4yikuTH862UfuVJahY7fFHeGl_qUJw=&ch=lefmM7sGv75CYvgpTK9dENyqA1Rv5PwzXZ1xlkZP-JITscwLK8iGsQ==

POSITION PAPER AND FORMAL RESPONSE TO OSHA FROM THE SOUTH CAROLINA STATE FIREFIGHTER'S ASSOCIATION: CLICK THE LINK HERE:

<https://cafda.net/wp-content/uploads/2024/04/Final-Draft-SC-FF-Assoc-OSHA-Response-Letter.docx>

Meeting with NYS-DOL/PESH

Dave Denniston Writes: We had a great meeting with PESH at the end of last week. They are willing to work with us, but admit that their hands are tied some. The NY PESH Officials have stated we have to get in front of OSHA and get a seat at the table. They could not stress enough that the head of OSHA needs to know our names and concerns.

I have also been contacted by one of our congressional friends that said they are behind us, but we have to get in front of OSHA and a seat at the table. They fear legal options are our only other remedy. NVFC is looking at that angle now.

I have attached my comment to OSHA that will be submitted today. **Along with this one we are going to have an online petition with a goal of 50K signatures.** More details to follow. SEE DAVE'S LETTER AT THIS LINK

:<https://cafda.net/wp-content/uploads/2024/04/OSHA-1910.156-REQUEST-FOR-ACTION-1.docx>}

Lee and I will be doing a more detailed bulleted dive of the specifics of 29CFR 1910.156 on Thursday night at 7 PM. The good news, as of this morning Zoom has us up to 1000 log in capacity. Over half of that is registered now, but let's fill it up. Most webinars have a about 60% hit ratio. These OHSA ones have been exceeding that hit ratio which is awesome. Please share the registration link with your email lists and organizations. There is also a link for one more geared to Ohio in a couple weeks.

This is being run as a ESIP webinar on **Thursday 4/4 at 7pm**. Here is the registration link, **PLEASE SHARE:**

https://archcapgroup.zoom.us/webinar/register/WN_9GtqnblySa-WTKiI-F5Sqw

Tom Miller and I are doing a similar webinar on **Wednesday Dec. 10th for the Ohio State Firefighters**. All are welcome to that one if the date is better. That one is a little more geared to a state where the volunteers are not "employees" but the main message is the same.

Register for OHIO Webinar Here: https://archcapgroup.zoom.us/webinar/register/WN_ae-TdGcUR3SDQJzuEaG_aQ

We cannot stress enough, our message is not that we oppose changes, and that in fact the fire service needs to embrace this and make serious changes in how we do business for firefighter safety. This has been our message since day 1, and some continue to ignore it. We need change and we need to do better for our people. What we do want is a seat at the table and some simple tweaks in the logistics of how this should be delivered, so it is in fact usable and will save lives and reduce injuries. WE CAN DO BETTER! There are still folks out there claiming we are trying to kill this thing. That could not be further from the truth, and we need to make sure that message is heard loud and clear.

Some Facts About the NFPA Standards Adopted as Part of The OSHA Emergency Response Standard

7 Page analysis of the NFPA Standards Included in the Proposed Emergency Response Standard

- [NFPA 1910/2024 \(263 page document\)](#)

Standard for the Inspection, Maintenance, Refurbishment, Testing and Retirement of In-Service Emergency Vehicles and Marine Firefighting Vessels.

- This standard defines the minimum requirements for establishing inspection, maintenance, refurbishment, retirement and testing program for in-service emergency vehicles and marine firefighting vessels.
- This standard shall provide minimum requirements for marine firefighting vessels.
- This standard also identifies the minimum job performance requirements (JPRs) for emergency vehicle technicians.
- The purpose of this standard is to specify the minimum requirements for the construction of new marine firefighting vessels or for the conversions of existing vessels to become marine firefighting vessels and...
- To specify the minimum JPRs for service as an emergency vehicle technician.
- 106 additional reference standards
- This standard establishes a check list of items to be checked and maintained by the personnel placed in charge of said equipment.

- [NFPA1001 \(35 page document\)](#)

Standard for Fire Fighter Professional Qualifications

This standard identified the minimum job performance requirements for FF 1 & FF 2 professional qualifications. [references 9 additional standards]

List of skills needed in Chapter 4 also refer to Table C.1 *Overview of JPRs for Fire Fighters*.

- AHJ shall have written policies and procedures in compliance with the standard and distributed to all, with instructions on execution.
- *Prior to entering training to meet the requirements of Chapters 4 & 5 of this standard the candidate shall meet the following requirements:*
- *Minimum educational requirements established by the AHJ*
- *Age requirements established by the AHJ*
- *Medical requirements of NFPA 1582 (106 page document) (this standard clearly references a career FF setting, job duties and performance)*

- [NFPA1407 \(23 page document\)](#)

Standard for Training Fire Service Rapid Intervention Crews

This standard specifies the basic training procedures for fire service personnel to conduct firefighter rapid intervention operations as specified in 1710 and 1720. [references at least 7 additional NFPA standards, in part.]

- Program shall be developed for all suppression personnel
- Written policies which shall address entry level requirements for crew members, training objectives, basic skills, equipment and training evolutions contained in the standard.
- Comprehensive training program
- Requirements for instructors
- Training shall be documented
- All RIC leaders shall be minimal Fire Officer 1
- AHJ shall have written policies and procedures in compliance with the standard and distributed to all, with instructions on execution.

- [NFPA 1002 \(30 page document\)](#)

Standard for Fire Apparatus Driver/Operator Professional Qualifications

- Outlines requisite skills and knowledge
- References in part 16 other NFPA standards.
- AHJ shall have written policies and procedures in compliance with the standard and distributed to all, with instructions on execution.
- **While not specifically stated, is it the intent that this standard applies to volunteer fire Drivers, it is not stated in the Scope nor in the Explanatory Material.**

- [NFPA 1021 \(41 page document\)](#)

Standard for Fire Officer Professional Qualifications

- References 10 other NFPA Standards in part.
- 17 Pages of requirements
- Requisite skills and knowledge for Fire Officer 1 through Fire Officer 4
- **While not specifically stated, is it the intent that this standard applies to volunteer fire Officers, it is not stated in the Scope nor in the Explanatory Material.**

- [NFPA 1140 \(124 page document\)](#)

Standard for Wildland Fire Protection

Purpose is to specify the minimum requirements for fire protection and emergency services infrastructure in wildland, rural and suburban areas; wildland fire management practices and policies; methods of assessing wildland fire ignition hazards and job performance requirements for wildland fire positions.

- 44 pages of requirements
- 30 referenced NFPA publications in part, plus 12 ASTM standards in part, plus others.
- **While not specifically stated, is it the intent that this standard applies to volunteer fire fighters who occasional respond to wildland fires, it is not stated in the Scope nor in the Explanatory Material.**

- [NFPA 1006 \(171 page document\)](#)

Standard for Technical Rescue Personnel Professional Qualifications

- This standard references in part 10 additional NFPA Standards.
- The Scope of this Standard identifies the minimum job performance requirements for technical rescue personnel. The intent is to ensure that individuals serving as technical rescue personnel are qualified.
- There are 92 pages of requirements including several specialty rescue scenarios.
- **While not specifically stated, is it the intent that this standard applies to volunteer fire fighters who occasional respond to Technical Rescues, it is not stated in the Scope nor in the Explanatory Material. Would those occasional volunteers have to be trained to the entire standard or to a portion of the standard?**

- [NFPA 1005 \(28 page document\)](#)

Standard for Professional Qualifications for Marine Fire Fighting for Land Based Fire Fighters

- The purpose is to specify the minimum job performance requirements for Land-Based Fire Fighters operating at marine fire-fighting incidents.

- There are an additional 7 NFPA standards reference in part.
- There are 11 pages of requisite skills.
- To meet the requirements for Marine Fire Fighter, the Fire Fighter II shall meet the JPRs in Sections 4.1 through 4.5 of this standard and the requirements defined in Chapter 5 of NFPA 1001 or Chapters 5 & 6 of NFPA 1081
- **While not specifically stated, is it the intent that this standard applies to volunteer fire fighters who *occasional* respond to Marine Fires, it is not stated in the Scope nor in the Explanatory Material. Would those occasional volunteers have to be trained to the entire standard or to a portion of the standard?**

- [NFPA 1951 \(68 page document\)](#)

Standard on Protective Ensembles for Technical Rescue Incidents

Scope: minimum design, performance, testing and certification requirements for technical rescue protective ensembles for use by emergency services personnel during technical rescue incidents.

Shall also specify the minimum requirements for various elements of the technical rescue protective ensembles, including garments, helmets, gloves, footwear and eye and face protection.

This standard shall apply to the design, manufacturing, testing and certification of new technical rescue protective ensembles and new ensemble elements. i.e. for the manufacturer of such equipment.

Deals with: certification, inspection and testing, annual verification of product compliance, manufacturers' QA program.

- References 44 other technical documents.

The job of the AHJ is to perform a risk assessment to identify the hazards present and to determine the suitability of protective ensembles specified by this standard.

The AHJ would need to create a matrix and document the evaluation of such equipment.

- [NFPA 1952 \(76 page document\)](#)

Standard on Surface Water Operations Protective Clothing and Equipment

Scope: Shall specify the minimum design, performance, testing and certification requirement for protective clothing and equipment items, including full body suits, helmets, gloves, footwear and personal flotation devices designed to provide limited protection from physical, environmental, thermal and certain common chemical and biological hazards for emergency services personnel during surface water operations.

Purpose: to **establish minimum levels of protection** for emergency services personnel assigned to or involved in surface water and rescue operations or other surface water incident operations.

- References 38 additional technical standards

Mostly for the manufacturer of such equipment, **the job of the AHJ is to perform a risk assessment to identify the hazards present and to determine the suitability of protective ensembles specified by this standard. The AHJ would need to create a matrix and document the evaluation of such equipment.**

- [FPA 1953 \(59 page document\)](#)

Standard on Protective Ensembles for Contaminated Water Diving

Basically, this standard shall specify requirements for protective clothing and protective equipment used during operations in contaminated water dive operations. The purpose of this standard shall be to establish minimum levels of protection for emergency service personnel assigned to or involved in performing search and rescue activities in and below the surface of contaminated water. This standard shall apply to the design, manufacture, and certification of new contaminated water dive operations protective clothing and equipment.

This standard applies to the manufacture of such equipment and not to the persons, using the equipment or the operations related to the equipment.

- References 33 additional technical standards

- [NFPA 1971 \(198 page document\)](#)

Standard on Protective Ensembles for Structural Firefighting and Proximity Firefighting

This standard shall specify the minimum design, performance, testing and certification requirements for structural fire fighting protective ensembles and ensemble elements that include coats, trousers, coveralls, helmets, gloves, footwear, and interface components.

The purpose of this standard shall be to establish minimum levels of protection for fire fighting personnel assigned to fire department operations including but not limited to structural firefighting, proximity firefighting, rescue, emergency medical and other emergency first responder functions.

In Chapter 8, 8.1.12 there are **procedures to be followed** for Washing And Drying Procedures For Garment, Gloves And Glove Pouches.

*This standard applies to the manufacture of such equipment and not to the persons, using the equipment or the operations related to the equipment, except for **Chapter 8** which includes procedures for washing and drying protective equipment.*

- 74 additional reference technical documents.

- [NFPA 1977 \(118 page document\)](#)

Standard on Protective Clothing and Equipment for Wildland Fire Fighting and Urban Interface Fire Fighting

This standard shall specify the minimum design, performance, testing and certification requirements for items of wildland firefighting and urban interface fire fighting protective clothing and equipment, including protective garments, helmets, gloves, footwear, goggles and protective chain saw protectors; and for load-carrying equipment.

This standard shall establish minimum standards for the equipment used by wildland and urban interface firefighters and does not apply to the personnel themselves or the operations of said firefighters.

- 45 additional referenced technical standards.

- [NFPA 1981 \(81 page document\)](#)

Standard on Open-Circuit Self-Contained Breathing Apparatus for Emergency Services

This standard shall apply to all open-circuit SCBA and combination SCBA/SARs used by emergency services organizations for respiratory protection of its personnel during firefighting, rescue, hazardous materials, terrorist incident, and similar operations where products of combustion, oxygen deficiencies, particulates, toxic products or other IDLH atmospheres exist or could exist at the incident scene.

This standard establishes minimum standards for the design, performance, testing and certification of new SCBA and SCBA/SARs and for the replacement parts, components and accessories for these respirators.

- 22 additional referenced technical standards

[NFPA 1982 \(70 page document\)](#)

Standard on Personal Alert Safety Systems

This standard shall specify minimum requirements for the design, performance, testing and certification for all personal alert safety systems (PASS) for emergency services personnel.

Shall apply to the design, performance, testing and certification of PASS or RF PASS devices certified to an earlier edition of this standard that incorporate replacement parts, components and or software to be certified to this edition of the standard. PASS should be worn on protective clothing or protective equipment, or as an integrated part of another item of protective clothing or protective equipment and used whenever the member is involved in fire suppression or similar activities, regardless of whether SCBA is worn.

Note that NFPA 1500 requires that each person involved in rescue, firefighting or other hazardous duties be provided with and use a PASS.

This standard applies to the manufacturer of PASS devices.

- 18 additional referenced technical standards.

- [NFPA 1984 \(39 page document\)](#)

Standard on Respirators for Wildland Firefighting Operations and Wildland Urban interface Operations

This standard shall specify the minimum design, performance, testing and certification requirement for respirators to provide protection from inhalation hazards for personnel conditioning wildland firefighting and or wildland urban interface operations.

This standard shall apply to the design, manufacturer, testing and certification of new wildland firefighting or wildland urban interface operations respirators.

This standard does not mandate the use nor prescribe the use of approved respirators for use by firefighting personnel.

- 12 additional referenced technical standards

- [NFPA 1986 \(70 page document\)](#)

Standard on Respiratory Protection Equipment for Tactical and Technical Operations

This standard shall specify the minimum requirements for the design, performance, testing and certification of (1) new compressed breathing air open-circuit self-contained breathing apparatus (SCBA) and compressed breathing air combination open-circuit self-contained breathing apparatus and supplied air respirator (SCBA/SAR) and (2) replacement parts, components and accessories for those respirators.

This standard does NOT deal with the use of such respirators by emergency personnel.

- 17 additional referenced technical standards

- [NFPA 1987 \(98 page document\)](#)

Standard on Combination Unit Respirator Systems for Tactical and Technical Operations

- 71 additional referenced technical standards

This standard shall specify the minimum requirements for the design, performance, testing and certification of new combination unit respirator (CUR) systems and for the replacement parts, components and accessories for such respirators.

This standard is for the design and manufacture standard for such respirators NOT with the use by personnel.

- [NFPA 1990 \(152 page document\)](#)

Standard for Protective Ensembles for Hazardous Materials and CBRN Operations

- 59 additional reference technical standards

This standard shall specify the minimum design, performance, testing, documentation, and certification requirements for the following PPE which is used by emergencies and CBRN terrorism incidents:

1. Vapor protective ensembles and ensemble elements for hazardous materials emergencies and CBRN terrorism incidents.
2. Liquid splash-protective ensembles and ensemble elements for hazardous materials emergencies.
3. Hazmat/CBRD protective ensembles and ensemble elements for hazardous materials emergencies and CBRN terrorism incidents.

The purpose of this standard shall be to establish a minimum level of protection for emergency responders during hazardous materials emergencies and CBRN terrorism incidents.

The standard deals with the equipment not the operations by personnel.

- [NFPA 1999 \(94 page document\)](#)

Standard on Protective Clothing and Ensembles for Emergency Medical Operations

- 60 additional referenced technical standards

The purpose of the this standard shall be to establish a minimum level of protection from contact with blood and body fluid-borne pathogens for personnel performing patient care during emergency medical operations.

Shall specify the minimum design, performance, testing, documentation and certification requirements for new single-use and new multiple-use emergency medical operations protective clothing, including garments, helmets, gloves, footwear and face protection devices used by emergency medical responders prior to arrival at medical care facilities during emergency medical operations and used by health care workers providing medical and supportive care.

The Standard deals with the equipment not the operations by personnel.

- [ANSI 107 High-Visibility Safety Apparel](#)

- Performance requirements of high-visibility safety apparel, or HVSA, help with providing visibility to the user under any light conditions by day or night. This is particularly crucial for hazardous conditions, as well as any situation where threats can be presented. The performance requirements include color, retroreflection, the recommended configuration of the materials, and more. Please note that ANSI/ISEA 107-2020's specifications may be applied to many occupational HVSA, but it is not for firefighter turnout gear.
- The updated ANSI/ISEA 107-2020 standard includes changes vs. the 2015 edition such as:
 - Removing the criteria for high-visibility accessories in favor of continuing to emphasize the configurations and design requirements that contribute to the Type-Performance Class designation.
 - Adding accommodating scenarios since garments can become soiled easily because of the work environment. This edition includes specific criteria for a single-use disposable coverall, which complies with the requisite minimum material amounts and color requirements imposed on all compliant HVSA, and emphasizes that the associated material integrity requirements are only applicable to single-use disposable coveralls, for which unique marking is applied.
 - Updates to the tests methods in an effort to align more closely with other material integrity tests and to recognize current versions used for evaluating the materials.
 - Introducing the concept of measuring the overall nighttime luminance of a garment by including optional language that allows a manufacturer to test a garment according to ASTM E1501.

In Total that is more than 1838 pages of additional document pages not including the thousands of pages of referenced documents within the NFPA Standards which the emergency response services would be legally liable for.

Formal Comment Submitted by CAFDA on Your Behalf!

<https://cafda.net/wp-content/uploads/2024/03/Extension-Request-from-CAFDA.docx>

Posted to the CAFDA.net website.

Tailboard Talk: The OSHA Fire Brigade Standard from Fire Engineering

https://www.fireengineering.com/podcasts/tailboard-talk-the-osha-fire-brigade-standard/?utm_medium=email&utm_source=fe_daily_newsletter&utm_campaign=2024-02-26

OSHA Proposes Major Changes to Regulations for the Fire Service

Insight from Curt Varone

<https://www.firelawblog.com/2024/02/15/osha-unveils-major-changes-it-proposes-for-the-fire-service/>

LINK TO THE PROPOSED OSHA STANDARD, NO FLUFF:

<https://cafda.net/proposed-changes-to-the-osha-standard-comment-period-opens-february-5th/>

Here are the links for the resources as Dave promised:

1. [Webinar: Emergency Response Rule | Oshaedne](#)
2. [OSHA's NEW Proposed Rule 1910.156 Emergency Response rule on Vimeo](#)
3. [Microsoft PowerPoint - 1910.156 Webinar 1-31-2024 draft 2.pptx \(oshaedne.com\)](#)

OSHA PROPOSED UPDATE TO THE BRIGADE STANDARD COMPLETE TEXT: <https://cafda.net/wp-content/uploads/2024/01/ER-NPRM-Unofficial-WORD-VERSION.docx>

LINK TO MY SYNOPSIS OF THE PROPOSED UPDATE: <https://cafda.net/wp-content/uploads/2024/01/SYNOPSIS-OF-THE-PROPOSED-UPDATED-OSHA-FIRE-BRIGADE-STANDARD-1.docx>