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Cc: Chen, Jihong (Jane) (CDC/NIOSH/EID) (CTR)
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Comments

First before getting into the actual document, the title of the document should be changed to reflect exactly what you are trying to accomplish.
"Preventing deaths and injuries of fire fighters when fighting fires in Unoccupied structures" is way too broad an approach to ever be accepted by the fire service.

This should be changed to something like: "Preventing deaths and injuries of fire fighters when fighting fires in Condemned or previously damaged structures" or "Preventing deaths and injuries of fire fighters when fighting fires in structures KNOWN to have damaged or compromised components" or "Preventing deaths and injuries of fire fighters when fighting fires in structurally compromised buildings". The last being my personal favorite as it does encompass all of the items we are looking for when we judge each structure. A structurally compromised building can be one damaged by weather, be it sun, wind or rain or an old deteriorated structure or one that has had a previous fire in it. It should be obvious that any structure that has had any substantial amount of damage to the structure or to the fire protection systems in the structure would also compromise that structure.

All structures are unoccupied at some time. In fact an occupied structure becomes unoccupied as soon as the occupants are removed either through self-evacuation or through rescue. The current title would make it appear that as soon as the rescue is over we should immediately evacuate the structure and apply water only via a defensive posture. This approach is unacceptable to most of us who understand that we can and do safely extinguish most fires in structures.

It appears to me that the intent of this document is not to restrict our ability to extinguish most fires but to make us better aware of those structures that are unsafe with any degree of fire involvement and to make fire departments establish policy and practices to assist in this endeavor.

As long as the word "Unoccupied" is left in this document and it is not clearly and fully defined, this document will only serve to confuse the fire service. Along with this is the misinterpretations that will be made by those charged with enforcing any adoption of it. The good folks at Labor and Industries, OSHA and others will each have their own definitions of Unoccupied and therefore, this document will be misinterpreted by many individuals. This will unfortunately include enforcement actions that will follow these misinterpretations. When Fire Fighter Smith twists his knee during the safe extinguishment of the bedroom fire in an unoccupied home where the occupants self evacuated, the Incident Commander may well be in violation of any state codes that have adopted this NIOSH document. I doubt that this would follow the actual intent of the creators of this document but it does follow the written words contained therein.

This is too important to leave to individual interpretation.

Now, on to the current wording in the document.

“No offensive interior attacks should be made in unoccupied or unsafe structures.”

Now this obviously makes sense in Unsafe structures but again, what are you considering “Unoccupied”. If I am not at home and a small fire is on my stove (I forgot a pan of food on the stove), the above sentence says that you can’t go in and use your extinguisher to put out this fire. This makes no sense and will not be acceptable to the fire service. I would suggest that you simply remove “unoccupied or “ from the current wording.

“Have a rapid intervention team in place anytime personnel are in a fire”.

Now at first reading this sounds fine, but it will completely handicap every department and actually will make it LESS SAFE for the fire fighters in the fire.

Here is why. First we must look at the reality of what happens at virtually all fires. The first fire engine shows up, most of the time alone. I would estimate that across the country this occurs 98+% of the time. This sentence would not allow them to extinguish the fire while it is still small. They would have to have a RIT team in place before they could extinguish this fire and by the time the second or third unit is on scene, the fire is now much larger due to the extra 3-6 minutes burn time.

Secondly, this RIT team requirement will change the fire ground operational priorities. Currently we look at the fire ground priorities as something like:

First engine lays an attack line.

Second engine lays a backup line and or a supply line.

First Ladder either ventilates or does a search.

With the current wording, one of the above items will be significantly delayed. Which one do we want to give up? The lack of or delay of ventilation will only make our job more difficult and dangerous. The lack of or the delay of the backup line or the supply line will surely increase injuries by fire service personnel.

The provision for a RIT or RIC team is already in place in other documents that we already follow and in light of this I would suggest that it only be referenced in this document or eliminated completely. The inclusion here of more stringent requirements does not increase our fire ground safety and I would suggest that it actually increases our chances of death or injury.

“Make sure that the incident commander or incident safety officer conducts an initial size-up before beginning fire-fighting efforts and continuously during all fireground operations.”

This is true except that the incident safety officer is not required to conduct initial size-ups before initial operations nor do we need this done by them. Having this requirement for either of these two individuals can and will create problems. This has always been a requirement for the incident commander and it should be left ONLY for them. If the safety officer does this size-up then you must have wording to state that the safety officer must fully inform the incident commander before any interior operations commence. This is unrealistic and un-workable. The emphasis must be for the incident commander to be responsible for these actions. I think “or Incident Safety Officer” should be removed from the document. This is referenced in the manner I am suggesting in other documents and they should be referenced here and not re-stated here.

“Consider all manual fire-suppression activities with-in the collapse zone to be an offensive attack.”

At first read this does not sound to restrictive but as this gets further review we can see where this will severely restrict fire ground operations. The fact that this fire building will not or could not easily collapse is not taken into effect in this statement. What has happened is that the document says to always establish a collapse zone, now there can’t be any offensive operations within the collapse zones so now if you identify this building as one that is compromised you must use only deck guns, ground monitors or aerial devices to attack the fire. This will mean we will burn many buildings down that should never have caught fire as exposure buildings. This is only going to make fire operations more difficult and it will not serve to reduce or eliminate fire fighter injuries or deaths. This sentence should be removed from this document.

Finally, after any changes are made to this document, it should again have another comment period. Even if you accept every change that I have suggested, I would want this to again be reviewed by the fire service before final publication. In the eyes of the fire service this would be the fair, honest and open way to address this issue.