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**From:** HAcree@aol.com  
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**To:** NIOSH Docket Office (CDC)  
**Subject:** 141 - Draft NIOSH Alert: Preventing Deaths and Injuries of Fire Fighters When Fi

**Docket Number NIOSH-141**

**Comments to:**

**NIOSH Alert: Preventing Deaths and Injuries of Fire Fighters When Fighting Fires in Unoccupied Structures.**

With my background of having served the fire service in Europe and USA with safety equipment for over three decades, I have an interest in all matters that have the potential to improve fire fighters safety and performance. I therefore studied the referenced publication with great interest.

I understand the publication to be a tool in the planning of fire fighting operations in unoccupied structures. I will get to that below, but cannot refrain from commenting on some disturbing statements made in the ingress of the document, some with reference to NFPA. What I find disturbing is that the text implies, directly or indirectly, that it is acceptable to risk fire fighters' lives and health under certain circumstances, and that a certain accident level is unavoidable. Examples:

Page 1: "...practices and policies to avoid the loss of fire fighters' lives when civilian lives are not in immediate danger."

Page 2: "Failure to revise an inappropriate or outdated attack plan is likely to result in an elevated risk of death or injury to fire fighters [NFPA 2007]."

Page 6: "We will risk our lives a lot..."

My opinion is that it should be a zero tolerance to fire fighters' accidents. Every fire operation should be planned in such a way that fire fighters' lives and health are not at risk. For example, if the distance to a victim is too far for the fire fighter to do a rescue and get out safely with the amount of air he is carrying, he shouldn't go. If a fire fighter is not fit for a mission, it should be given to someone else or avoided.

We all know that fires are unpredictable and that unexpected things happen leading to that fire fighters are put at risks. That means that accidents will happen, but only then should they be tolerable.

We can compare with physicians who also are sworn to do their utmost to protect lives. But will they risk their own in the mission? I don't think so. The same should be valid for fire

fighters.

Back to the issue about unoccupied buildings. How can an incident commander ever be sure that an unoccupied building really is empty? Evacuated buildings become shelters for the homeless and drug addicts, or playgrounds for youngsters. Isn't the fact that a fire has started in an unoccupied building sometimes a sign of human presence?

My conclusion is that the publication in its present form in both the areas of general risk taking and assumptions when responding to unoccupied buildings at best is harmless. More likely it will contribute to confusion and misunderstanding. I am sure fire ground recommendations are of value, but fall outside my area of expertise.

If NIOSH really has a desire to improve fire fighters' safety (and in the process making them more productive), there are more important areas to consider, like:

- Outlaw the use of 30 minute rated SCBA for structural fire fighting in favor of 45 or 60 minute rated SCBA (without added weight) or alternatively, change the minute ventilation for rating of short duration SCBA from 40 liters to something more realistic.
- Record the core temperature for fire fighters and cancel there operation at dangerous temperatures to avoid heat stress and heat stroke.
- Make sure that fire fighters meet and maintain a certain fitness level.

As I have advocated in other contexts (see my written comments to NIOSH' Town Hall Meeting, March 25, 2008), this is not wishful thinking. There are relatively simple ways to achieve these goals, but they don't happen by themselves. Stricter rules have to be implemented. Taking into account the number of accidents involving trapped or disoriented fire fighters, and the number of heart failures in the fire service, many body heat and/or fitness related, it would be a realistic estimate that the accident level could be cut into half compared to present level if rules as suggested were implemented.

Respectfully submitted,

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