



# INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS®

HAROLD A. SCHAITBERGER  
General President

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December 14, 2017

Ed Conlin  
Division Manager  
Public Fire Protection Division  
National Fire Protection Association  
1 Batterymarch Park  
Quincy, MA 02269

## **RE: International Association of Fire Fighters' Response to NFPA Contamination Control**

Dear Mr. Conlin:

On behalf of the 310,000 members of the International Association of Fire Fighters (IAFF), I am submitting this letter to confirm our position that the most appropriate way to address the pressing need for guidance on contamination control is through immediate revisions to current standards – specifically 1500, 1581, 1584 and 1851 – rather than through the development of a new stand-alone standard.

The contamination of personal protective equipment (PPE), self-contained breathing apparatus (SCBA), firefighting tools and fire hoses during fire suppression and overhaul operations occurs daily.

Preventing unnecessary exposure to the byproducts of combustion requires diligence on the part of our members to not only wear appropriate PPE throughout all phases of an emergency incident, but also to ensure that once the incident has been stabilized -- and before personnel return to full service -- that all firefighting equipment and PPE, as well as the fire fighters themselves, are properly and thoroughly decontaminated.

Currently, the industry lacks sufficient guidelines to address the critical tasks of decontamination and the prevention of cross contamination of areas where fire fighters should be safe, such as the cab of a fire truck or ambulance and in fire station living quarters.

Cancer has become the leading cause of line-of-duty deaths (LODDs) for fire fighters, surpassing the number of LODDs associated with traumatic and thermal injuries on the fire ground and in apparatus responding to and from incidents.

Research has shown that contaminants, including Volatile Organic Compounds (VOCs) and Polycyclic Aromatic Hydrocarbons (PAHs), settle on protective equipment and do not break down, leading to longer exposure times and an increased rate of various health problems. VOCs and PAHs are persistent toxins that remain constant in the air and on protective equipment.



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These particulates, if not removed correctly, can then contaminate the cab of fire apparatus and ambulances, and be carried back to the station. Due to off-gassing, this may lead to extended exposure periods linked to the increasing rates of cancer in the fire service.

IAFF members, and all fire fighters, need immediate guidelines for contamination control. Creating a new standard is a long-term project that will take many years to develop. This delay is not in our first responders' best interests. Fire fighters cannot afford to wait several years for the development of a new standard.

Incorporating contamination control requirements and related information into NFPA 1500, 1581, 1584 and 1851 provides a more urgent response to the need for guidance, as they are currently in the revision process. This will allow authorities with jurisdiction (AHJs) to implement these controls sooner.

**Therefore, we recommend incorporating contamination control into the NFPA 1500, 1581, 1584 and 1851 standards.**

The IAFF proposes both a short-term and a long-term plan for consideration by NFPA.

In the short-term (0 to 18 months), we recommend:

1. NFPA 1500 and 1581 Committees submit inputs during the First Draft meeting (or committee members submit inputs during the Public Input period) to provide general direction for contamination reduction efforts, which include pointers to specific existing standards to address contamination control solutions specific to the related elements.
  - NFPA 1500 Public Inputs close January 4, 2018
  - NFPA 1581 Public Inputs close January 3, 2019
2. NFPA 1851 addresses contamination control issues as planned through the current Public Comment and Second Draft meeting process. Public Comments closed November 16, 2017. The next edition will be dated 2019. The complete rewrite of NFPA 1851 will overlap with practices covered by NFPA 1500. This is an unavoidable outcome of the timing of each revision cycle.
3. The Public Fire Protection Division issued a statement to all Technical Committee chairs for all affected standards on equipment, training and qualifications to address contamination control within their standards during the current revision cycle or via the TIA process, as appropriate.
4. NFPA immediately sets up a Contamination Control Review and Advisory Committee to aid in the direction provided to the individual Technical Committees for the primary purpose of coordination among different projects.

A long-term (>18 months) approach may include:

- Use NFPA 1500, 1581 and 1584 as the over-arching contamination control standards that provide general guidance and point to specific standards for detailed requirements.



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- Work with existing committee projects to establish new standards as needed to address cleaning and other maintenance areas for products where end user-based standards do not currently exist.
- Continue the proposed NFPA Contamination Control Review and Advisory Committee to provide a mechanism to minimize conflicts between standards and provide oversight of the five fire service project areas and related contamination control/reduction issues.

Overarching coordination efforts on the part of NFPA are critical to assure consistency in the requirements of various standards related to contamination in all NFPA fire service-related standards. We suggest that this issue be discussed by the appropriate Technical Committee and correlating committee chairs, facilitated by NFPA with a recommendation to the Standards Council. This group should also layout a road map indicating which contamination issues would be addressed by each Technical Committee.

In summary, the IAFF does not believe that the development of a new stand-alone standard on contamination control is appropriate. It is our position that the NFPA 1500, 1581, 158, and 1851 Technical Committees begin work on contamination control immediately.

Sincerely,

Harold A. Schaitberger  
General President