Date: November 20, 2017

Mr. Ed Conlin

Division Manager

Public Fire Protection Division

National Fire Protection Association

1 Batterymarch Park

Quincy, MA 02269

**RE: Correlating Committee Response to Handling Contamination Issues via NFPA Standards**

Dear Mr. Conlin:

This letter is in response to your October 11, 2017 email request to the NFPA FAE-AAC Correlating Committee on Fire and Emergency Services Protective Clothing and Equipment. That request referred to your October 5, 2017 NFPA Blog entitled *“Should NFPA develop an all-new standard on PPE contamination control or roll the requirements in NFPA 1581?”*

This blog states “The NFPA Standards Council has received a New Project Initiation Request from the fire service asking NFPA consider developing an ANSI Accredited Standard to establish minimum requirements for the effective contamination control of fire department personnel, their protective equipment (PPE), accessories, and equipment.”

During our November 1, 2017 Correlating Committee conference call we discussed this important topic. I then established a Task Group lead by Rick Swan (IAFF) who developed the input below.

There is consensus among Correlating Committee members that developing a new standard, while providing a possible approach for creating an overarching resource for all topics related to contamination control, is not an efficient way to address the issue with the urgency the topic demands. Such an effort will take several years to produce a standard, even if it’s fast-tracked. For example, even with the expedited process being applied to developing a standard on the subject of active shooter protection, a minimum of four years will elapse before the standard can be promulgated.

Simply put, the fire service cannot afford that delay. Developing a new contamination control standard may be a viable long-term consideration but short-term solutions are needed now and it is this Correlating Committee’s opinion that the existing framework of standards can be mobilized to meet this demand.

The option of rolling contamination control requirements and related information into NFPA 1581, holds more promise but also offers room for improvement. This approach needs to go beyond employing a single standard charged with the responsibility for principally addressing the topic of contamination control and instead make use of the suite of different standards where the topic can be addressed through the provision of the appropriate subject matter expertise.

The Correlating Committee does agree that including pointers within standards in the 1500-range of NFPA documents makes sense and will result in the fastest implementation of appropriate guidance. There is also merit in focusing on NFPA 1581, however, in the interest of serving the fire service as quickly as possible, it makes sense to incorporate the primary pointers within NFPA 1500, *Standard on Fire Department Occupational Safety, Health, and Wellness Program*. The standard was recently revised with a new chapter for addressing contamination. NFPA 1500 is currently open for Public Input with the next revision completed as a 2020 edition.

On the other hand, while NFPA 1581 is also currently open for Public Input, the next revision will be a 2021 edition – adding an additional year while the fire service waits for minimum requirements. As an aside, this Correlating Committee does see NFPA 1851 as an effective platform to provide more detail for addressing certain key issues such as contamination control on the fireground or emergency scene, in the apparatus, and at the fire station, since there are no other standards where requirements in the area of contamination control have been currently specified with the exception of PPE.

While many structural coat and pant PPE issues are being addressed in the current revision (2019 fall cycle) of NFPA 1851, *Standard on Selection, Care, and Maintenance of Protective Ensembles for Structural Fire Fighting and Proximity Fire Fighting*, these revisions are only starting to address all aspects of contamination control as related to turnout gear and it is recognized that additional requirements and annex information will be needed for effectively addressing cleaning and contamination control as related to PPE. Moreover, PPE is just one part of the overall span of elements spanning a range of different equipment and operational issues that are covered in multiple standards, under multiple projects and with or without correlating committees.

In conclusion, the members of this Correlating Committee propose both a Short-Term and a Long-Term plan for NFPA consideration.

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 that is in process 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 issue a statement to all 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 set up a Contamination Control Review and Advisory Committee to aid in the direction provided to the individual committees for the primary purpose of coordination among the different projects.

A Long-Term (>18 months) approach could include:

* Develop an over-arching contamination control standard that provides general guidance and points to specific standards for detailed requirements. This could be a replacement for the portions of the contamination control addressed in the modified NFPA 1500 and NFPA 1581. This standard may belong with the Fire Service Occupational Safety and Health documents and this may initiate an organization restructuring to help manage all of the standards in this project.
* 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 Panel that would provide a mechanism to minimize conflicts between standards and provide oversight of the five fire service project areas and related contamination control/reduction issues.

As you can see, our CC believes that there should be some overarching coordination effort on the part of NFPA 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 among the appropriate Technical Committee and Correlating Committee chairs, facilitated by NFPA, with a recommendation to the Standards Council. This group could also lay out a “road map” of which contamination issues would be addressed by each technical committee.

For our part, this CC will direct Technical Committee chairs within our project to develop and implement appropriate contamination control requirements within our protective clothing and equipment standards.

In summary, our CC does not feel that the development of a new stand-alone standard on contamination is appropriate at this time. We feel that individual projects and technical committees should begin work on this issue immediately and that NFPA 1500 can serve as a central coordinating point for these requirements by “pointing” to the appropriate standard and developing appropriate requirements for NFPA 1500 that are not under the responsibility of another Technical Committee. Lastly, we feel that NFPA should convene a meeting among Technical and Correlating committee leadership to assure coordination of all efforts.

On behalf of the Correlating Committee on Fire and Emergency Services Protective Clothing and Equipment, thank you for the opportunity to provide input. Please let me know if we can provide any further information and support.

Sincerely,

William Haskell, Chair

Correlating Committee on Fire and Emergency

Services Protective Clothing and Equipment (FAE-AAC)

NIOSH/NPPTL – Standards Coordinator

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c. Technical Committee Chairs, Fire and Emergency Services Protective Clothing and Equipment

Randy J. Krause, Chair, Technical Committee on Fire Service Occupational Safety and Health

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