



IAFF Summary – Proposed OSHA Regulations

Below are generalized summaries of each subsection¹ in the proposed regulation 1910.156:

- **Subsection C: Organization of the WERT, and Establishment of the ERP and Emergency Service Capability**
 - The proposed rule requires Workplace Emergency Response Teams² (WERT) to develop and implement Emergency Response Plans (ERPs) for emergency response scenarios to which members may potentially respond. These plans are designed to provide a planned response to reduce injuries to the responding members. This is designated for private-sector members.
 - **IAFF currently supports the intent of this subsection.**
- **Subsection D: ESO Establishment of ERP and Emergency Service Capability**
 - The proposed rule requires Emergency Service Organizations³ (ESO) to develop and implement Emergency Response Plans (ERPs) for emergency response scenarios to which members may potentially respond. This is designed to provide a planned response to reduce injuries to the responding members. This is designated for the public sector members.
 - **IAFF currently supports the intent of this subsection.**
- **Subsection E: Team Member and Responder Participation**
 - The proposed rule would require ESOs and WERTs to include member representatives in the development and implementation of the ERP. This is a significant improvement in current practices and provides a seat at the table for employee representatives in developing the response plans.
 - **IAFF strongly supports the intent of this subsection.**

¹ Section 5 of the NPRM for the Emergency Response Rule refers to each subsection as a paragraph.

² Workplace Emergency Response Team (WERT): OSHA defines this term as a team of dual-role employees who perform “collateral duty to their regular daily work assignments, respond to emergency incidents to provide service(s) such as firefighting, EMS, and technical search and rescue at the employer’s facility.”

³ Emergency Service Organization (ESO): OSHA defines this term as “employers that provide emergency service(s) as a primary function of the organization, or the employees perform emergency service(s) as a primary duty for the employer.”

- **Subsection F: WERT and ESO Risk Management Plan**
 - The proposed rule will require Workplace Emergency Response Employers⁴ (WERE) and ESOs to develop and implement a written comprehensive risk management plan based on the community needs, department capabilities, training provided, PPE, vehicles, infection control, and other measures. This process will identify where ESOs and WEREs are not meeting operational expectations and develop a reasonable timeline for implementation to meet the needs of the community.
 - **IAFF currently supports the intent of this subsection.**
- **Subsection G: Medical and Physical Requirements**
 - The proposed rule is the most controversial for WEREs, ESOs, and fire service organizations. Many important requirements for annual physicals, medical monitoring, physical fitness services, mental health services, medical screenings, and physical fitness programs exist, but there are concerns about implementation details. The IAFF is evaluating the full impact of the proposed requirements and potential alternative approaches.
 - **The IAFF supports the intent but will submit comments offering alternative language.**
- **Subsection H: Training**
 - The proposed rule would establish minimum training requirements for basic fire fighter qualifications, officer training and qualifications, technical and hazardous materials qualifications, wildfire response, and marine fire response by land-based fire fighters. The rule would also require levels of continuous training to maintain member proficiency.
 - **The IAFF currently supports the intent of this subsection.**
- **Subsection I: WERE Facility Preparedness**
 - The proposed rule would require WEREs to provide for the safety of the members at the station facility, including designated decontamination areas, limiting contaminated PPE access, smoke alarms, sprinklers, and proper adapters.
 - **The IAFF currently supports the intent of this subsection.**

⁴ Workplace Emergency Response Employer (WERE): OSHA defines this term as “employers engaged in industries such as manufacturing, processing, and warehousing that have, or establish, a workplace emergency response team.”

- **Subsection J: ESO Facility Preparedness**
 - The proposed rule would require the ESOs to ensure the safety of the members at the station facility, including designated decontamination areas, limiting contaminated PPE access, smoke alarms, sprinklers, and proper adapters.
 - **The IAFF currently supports the intent of this subsection.**
- **Subsection K: Equipment and PPE**
 - The proposed rule requires WEREs and ESOs to provide appropriate PPE for the task assigned. The PPE shall meet current standard requirements specific to the application with several NFPA Standards referenced. The rule would require the removal of PPE that does not meet the minimum standard, but the rule does waive the 10-year retirement requirement found in the NFPA Standard.
 - **The IAFF supports the intent but will submit comments offering alternative language.**
- **Subsection L: Vehicle Preparedness and Operation**
 - The proposed rule establishes requirements for vehicle safety in preparedness, maintenance, upkeep, and inspections and in operations during response, including training, safe handling, and the establishment of Standard Operating Procedures (SOPs).
 - **The IAFF currently supports the intent of this subsection.**
- **Subsection M: WERE Pre-Incident Planning**
 - The proposed rule will require WEREs to identify applications and structures requiring pre-incident plans. The WEREs are then required to develop the plan and provide accessibility to the members. These plans shall be reviewed annually.
 - **The IAFF currently supports the intent of this subsection.**
- **Subsection N: ESO Pre-Incident Plans**
 - The proposed rule will require an ESO to identify structures within the community that require pre-incident plans. These plans shall be developed accounting for contents, processes, structure types, and occupants. They shall be accessible to the responding members.
 - **The IAFF currently supports the intent of this subsection.**
- **Subsection O: Incident Management System**
 - The proposed rule identifies the importance of an Incident Management System (IMS) and will require its implementation on every response to the level required to manage it effectively and safely.
 - **The IAFF currently supports the intent of this subsection.**

- **Subsection P: Emergency Incident Operations**
 - The proposed rule is directed at establishing the appropriate Incident Management System and its ability to scale to the size of the incident. It also focuses on the span of control and establishing control zones.
 - The rule also identifies areas of concern in structure fires, highlighting the two-in, two-out rule and identifying possible exceptions. It requires adherence to accepted industry standards in implementing SOPs, the use of proper PPE, and the importance of proper communication for all members on the emergency scene.
 - **The IAFF supports the intent but will submit comments offering alternative language.**

- **Subsection Q: Standard Operating Procedures**
 - The proposed rule will require the development and implementation of SOPs for all identifiable responses and highlight the importance of adherence. The rule also highlights specifics to PPE use, vacant building responses, communications, and mayday events.
 - **The IAFF supports the intent but will submit comments offering alternative language.**

- **Subsection R: Post-Incident Analysis**
 - The proposed rule will require WEREs and ESOs to promptly conduct a post-incident analysis (PIA) after a significant event, such as large-scale incidents, near-miss incidents, member injuries, or fatalities. The most important requirement, aside from the PIA, is the requirement to include an employee representative in the PIA process.
 - **The IAFF currently supports the intent of this subsection.**

- **Subsection S: Program Evaluation**
 - The proposed rule will require WEREs and ESOs to evaluate the adequacy of the Emergency Response Plan annually, address deficiencies immediately if identified, and, if that is not possible, develop a written plan that is shared with the employee representative.
 - **The IAFF currently supports the intent of this subsection.**