

- 8. Discussion regarding status of issue related to protective clothing for airport firefighters and the National Fire Protection Association's response to the formal interpretation request.**



## National Fire Protection Association

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June 4, 2014

Mr. Jessie Gentry, Assistant Fire Chief VIA EMAIL ONLY  
Dallas Fort Worth International Airport Fire Department  
P.O. Drawer 610687  
DFW Airport, TX 75261

**Re: Formal Interpretation Request for NFPA 1851, *Standard on Selection, Care, and Maintenance of Protective Ensembles for Structural Fire Fighting and Proximity Fire Fighting*, 2014 edition**

Dear Mr. Gentry:

NFPA is in receipt of your request for a Formal Interpretation of NFPA 1851, *Standard on Selection, Care, and Maintenance of Protective Ensembles for Structural Fire Fighting and Proximity Fire Fighting* (2014 edition), and specifically Section 5.1.2 (1-7).

In accordance with the *Regulations Governing the Development of NFPA Standards* (Regulations), I have consulted with the appropriate Staff Liaison and determined that your request for a Formal Interpretation will not be processed. The reasons for this determination are found in Section 6.1.5 (d) of the Regulations. Specifically, the requested Formal Interpretation addresses NFPA 1851 requirements which involve “subjects that are not addressed in the NFPA Standard.”

NFPA 1851, *Chapter 5*, sets forth risk assessment criteria to be considered by an organization (as that term is defined within the Standard) prior to the selection of fire fighting ensembles and ensemble elements. As expressed within the Scope of NFPA 1851 (see *Chapter 1, 1.1 Scope, Chapter 5, 5.1.3* and the associated *Annex A.5.1.3*), the standard “shall specify the minimum selection, care, and maintenance requirements” for structural and proximity fire fighting protective ensembles and ensemble elements. Simply, the standard requires an organization to conduct a risk assessment prior to deciding what ensembles and ensemble elements to purchase but beyond this, does not address the scope of authority of an organization nor how the organization may exercise its judgment in determining whether or not to purchase such (see *Chapter 5, 5.1.1, Annex Note A.5.1.1, and Table A.5.1.1*).

Thank you for your interest in the NFPA standards development process. We look forward to your continued involvement.

Sincerely,

Dawn Michele Bellis  
Secretary, NFPA Standards Council



Dallas/Fort Worth International Airport  
Public Safety

Firefighter Advisory Committee Meeting  
Airport Firefighters & Proximity Firefighting  
April 2, 2014

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Objective

- Reverse the compliance ruling that all Airport Firefighters must wear Proximity Clothing
  
- Recommendations driven by:
  - NFPA 1500
  - NFPA 1971
  - NFPA 1851
  - Texas Government Code
  - Texas Administrative Code
  - Customer Service (safety)



## Standards & Codes

- NFPA 1500 (7.3) Protective Clothing for Proximity Fire-Fighting Operations
  - 7.3.1 When determining the need for proximity ensembles, the organization shall perform a risk assessment as required by Chapter 5 of NFPA 1851, *Standard on Selection, Care, and Maintenance of Protective Ensembles for Structural Fire Fighting and Proximity Firefighting*.
  - 7.3.2 When it is determined proximity protective ensembles are required, members shall be provided with and shall use proximity fire-fighting protective ensembles and ensemble elements that are compliant with NFPA 1971, *Standard on Protective Ensembles for Structural Fire Fighting and Proximity Fire Fighting*.



## Standards & Codes

- NFPA 1851 (Chapter 5, Selection and Purchase)
  - 5.1.1 Prior to starting the selection process of structural fire fighting ensembles and ensemble elements and proximity fire fighting ensembles and ensemble elements, the organization shall perform a risk assessment.
  - 5.1.2 The risk assessment shall include, but not limited to, the hazards that can be encountered by structural or proximity fire fighters based on the following:
    - Types of duties performed
    - Frequency of use of ensemble elements
    - Organizations experiences
    - Incident Operations
    - Geographical location and climate
    - Specific general area of operation
    - Likelihood of or response to CBRN terrorism incident



## Standards & Codes

- NFPA 1971 (1.1) Scope
  - 1.1.1 This standard shall specify the minimum design, performance, testing, and certification requirements for structural fire fighting protective ensembles and ensemble elements that include coats, trousers, coverall, helmets, gloves, footwear, and interface components.
  - 1.1.2 This standard shall specify the minimum design, performance, testing, and certification requirements for proximity fire fighting protective ensembles and ensemble elements that include coats, trousers, coverall, helmets, gloves, footwear, and interface components.
  - A1.1 Organizations responsible for specialized functions including, but not limited to, wildland firefighting, proximity firefighting, and other specialized fire fighting, emergency medical service, special operations, and hazardous materials response should use appropriate protective clothing and protective equipment specifically designed for those activities.



## Standards & Codes

- Texas Government Code (419.043)
  - The National Fire Protection Association standard applicable to protective clothing, self-contained breathing apparatus, or personal alert safety systems is the standard in effect when a fire-fighting agency contracts to purchase the item. The agency may continue to use an item that was in use or contracted for before a change in a standard unless the commission determines that the continued use constitutes an undue risk to the wearer, in which case the commission shall order the use be discontinued and shall set an appropriate date for compliance with the revised standard.



## Standards & Codes

- Texas Government Code (419.040)
- (a) A fire department shall purchase, provide, and maintain a complete ensemble of appropriate protective clothing for each of its fire protection personnel who would be exposed to hazardous conditions from fire or other emergencies or where the potential for such exposure exists.
- (b) The protective clothing shall be suitable for the task that the individual is expected to perform and must comply with the minimum standards of the National Fire Protection Association or its successor.
- (c) The fire department shall develop and maintain a standard operating procedure covering the proper use, selection, care, and maintenance of all of its protective clothing.



## Standards & Codes

- Texas Administrative Code (427.7)
  - Each and every set of protective clothing, including proximity clothing, that will be used during the course of instruction for a commission approved fire protection personnel curriculum shall comply with §435.1 of this title (relating to Protective Clothing). This rule applies whether the protective clothing is provided by the academy or the trainee.
  - (1) Protective clothing and elements no longer in use to the organization for emergency operations service, but are not contaminated, defective, or damaged, may be used for training that does not involve live fire training, provided such clothing and elements are appropriately marked to be easily recognized.
  - (2) Protective clothing used for aircraft rescue, live fire training, shall be suitable for the type of fire the student is being trained for and shall be determined by the chief training officer of the training facility.



## Standards & Codes

- Texas Administrative Code (435.1)
  - A regulated fire department shall:
    - (2) ensure that all protective clothing which are used by fire protection personnel assigned to fire suppression duties comply with the minimum standards of the National Fire Protection Association suitable for the tasks the individual is expected to perform. The National Fire Protection Association standard applicable to protective clothing is the standard in effect at the time the entity contracts for new, rebuilt, or used protective clothing; and
    - (3) maintain and provide upon request by the commission, a departmental standard operating procedure regarding the use, selection, care, and maintenance of protective clothing which complies with NFPA 1851, Standard on Selection, Care, and Maintenance of Structural Fire Fighting Protective Ensembles.

**Results**

- Proximity Firefighting (Defined per NFPA 1851)
  - Specialized firefighting operations that can include the activities of rescue, suppression, and property conservation, at incidents involving fire producing high levels of radiant heat as well as conductive and convective heat.
- No Standard or State Code exists that specifically states "Airport Firefighters must wear Proximity Clothing" whether responding to or standing by in the movement area.
- NFPA 1500 states that a risk assessment as specified in NFPA 1851 shall be performed to determine selection of protective clothing (structural, proximity, wildland, CBRN, etc).
- Proper Protective Clothing meeting NFPA 1971 and suitable for the task that the individual is expected to perform will provide the greatest safety for all firefighters.



**Recommendation**

- Allow Fire Departments in the State of Texas to make decisions related to the selection and purchase of **Protective Clothing** through:
  - The results of the Risk Assessment as specified in the most current Edition of NFPA 1851.