



Texas Commission on Fire Protection

P.O. Box 2286, Austin, Texas 78701-2286

PH# 512-936-3838

Website: www.tcfp.texas.gov

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NFPA 1970 (2025) Compliance Guide

For Fire Department Leadership & Safety Officers

SECTION 1: Administrative & Program Compliance

(Chapters 1–9)

These chapters establish scope, definitions, certification, labeling, testing, and design requirements.

Assign Responsibility

Designate a PPE Program Manager (typically Safety Officer or Logistics Officer) responsible for:

- PPE selection & specification
- Vendor qualification
- Documentation & recordkeeping
- Inspection and retirement tracking
- Certification verification
- Policy development

Update Department Policies

Create or revise written SOPs covering:

- Structural firefighting PPE
- SCBA & respiratory protection
- PASS devices
- Interface component compatibility



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- Inspection, cleaning, repair, retirement

Ensure policies explicitly reference:

“All applicable PPE shall meet NFPA 1970, 2025 Edition.”

Verify Certification & Labeling (Critical Step)

NFPA 1970 requires third-party certification.

✓ Action Checklist

For every PPE item:

- Confirm **current third-party certification mark**
- Verify certification to **NFPA 1970 (2025 edition)**
- Obtain:
 - Manufacturer Certificate of Compliance
 - Product data sheet
 - Independent lab listing documentation

Inspect Labeling Must Include:

- Manufacturer name
- Model number
- Size
- Date of manufacture
- Compliance statement
- Certification mark
- Cleaning instructions
- Warnings

Document verification in PPE tracking system.



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Conduct Hazard Assessment

NFPA 1770 requires selection based on hazards.

Perform written hazard assessment covering:

Hazard	Required Ensemble Type
Structural firefighting	Structural ensemble
Wildland firefighting	Wildland ensemble
Technical rescue	Rescue ensemble
High heat environments	Full structural
EMS only	Appropriate protective garment

Keep hazard assessment on file and review annually.

Ensemble Compatibility Review

Chapters 1–9 emphasize **component interface performance**.

Verify:

- Coat/pant overlap compliance
- Glove-to-sleeve interface
- Boot-to-pant interface
- SCBA facepiece compatibility
- PASS integration
- Hood interface coverage

Conduct physical fit testing with members wearing full ensemble.

Document evaluation results.



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SCBA & PASS Compliance (If Applicable Under Ch. 15–24 Scope)

Confirm:

- SCBA certified to applicable NFPA respiratory requirements integrated into 1970
- PASS device certification
- Facepiece and regulator labeling
- Compatibility with structural ensemble

Maintain inspection logs per manufacturer and department SOP.

Training Requirements

Provide documented training on:

- PPE limitations
- Donning/doffing procedures
- Interface checks
- Inspection criteria
- Cleaning procedures
- Heat stress awareness
- Contamination reduction

Maintain attendance records.

Inspection Program

Establish three inspection levels:

1. Routine (After Each Use)

- Visual inspection
- Soiling
- Damage
- Interface integrity



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2. Advanced (At Least Annually)

- Conducted by trained personnel
- Moisture barrier check
- Thermal liner inspection
- Reflective trim condition
- Seam integrity

3. Specialized (If Required)

- Per manufacturer or certified ISP

Document every inspection.

Cleaning & Decontamination Compliance

NFPA 1970 includes cleaning label requirements.

Ensure:

- Only manufacturer-approved cleaning methods
- Documented cleaning schedule
- Advanced cleaning after structure fires
- No chlorine bleach (unless manufacturer-approved)
- Controlled drying temperatures

Maintain cleaning logs.

SECTION 2: Structural & Technical Requirements

(Chapters 15–24)

These chapters address specific ensemble types and performance criteria.



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Structural Firefighting Ensemble

Required Components:

- Helmet
- Hood
- Coat
- Pants
- Gloves
- Footwear
- SCBA
- PASS

Compliance Steps:

1. Confirm structural ensemble certification
2. Verify TPP (Thermal Protective Performance) rating meets minimum
3. Confirm THL (Total Heat Loss) rating
4. Check moisture barrier labeling
5. Confirm reflective trim performance
6. Verify DRD (Drag Rescue Device) compliance

Maintain documentation of:

- Date placed in service
- Age tracking (typically 10-year max service life unless otherwise specified)

Proximity / High Heat (If Applicable)

Verify:

- Aluminized outer shell compliance
- Radiant heat protection rating
- Design specific to ARFF or industrial hazards



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Recordkeeping Requirements

Maintain:

- Individual issue records
- Inspection logs
- Cleaning records
- Repair records
- Retirement documentation
- Certification documentation
- Hazard assessment documentation
- Vendor documentation

Retention recommended: life of garment + 5 years.

Repair & Alteration Controls

- Only manufacturer or certified ISP repairs
- No field alterations
- Maintain repair documentation
- Remove from service if structural damage compromises performance

Retirement & Replacement

Remove PPE if:

- Exceeds maximum service life
- Fails inspection
- Compromised moisture barrier
- Thermal liner damage
- Excessive contamination
- Manufacturer recall

Maintain formal retirement policy.



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Annual Compliance Audit Checklist

Conduct annual internal audit including:

- Certification verification
- Random inspection review
- Interface testing
- Label compliance review
- SOP review
- Training review
- Hazard reassessment
- Vendor compliance check

Document findings and corrective actions.

Vendor Management

Require vendors to provide:

- Proof of third-party certification
- Compliance letters
- Warranty documentation
- Change notification policy
- Replacement part compliance verification

Avoid purchasing non-certified “look alike” gear.

Implementation Timeline Example

Month	Action
1	Policy update & hazard assessment
2	Inventory certification audit
3	Replace non-compliant PPE
4	Training rollout



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Month	Action
5	Interface testing
6	Full documentation audit

✓ Compliance Summary Checklist

Fire department should be able to answer YES to:

- All PPE certified to NFPA 1970 (2025)?
- Written hazard assessment complete?
- All components interface-tested?
- Inspection program documented?
- Cleaning program compliant?
- Repair process controlled?
- Retirement policy enforced?
- Records maintained?
- Training documented?
- Annual audit conducted?

If yes — department is substantially compliant with Chapters 1–9 and 15–24.