


Public Comment No. 6-NFPA 1010-2022 [Global Input]**Additional Proposed Changes**

<u>File Name</u>	<u>Description</u>	<u>Approved</u>
Correlating_Committee_Note_No._1.pdf		

Statement of Problem and Substantiation for Public Comment

NOTE: The following Correlating Committee Note No. 1 appeared in the First Draft Report as a Global Input.

Technical committee to review the use of the word "Personnel" in the position title of Support Personnel and where used elsewhere (definitions, chapter 4, etc.) in the proposed NFPA 1010 document. The correlating committee identified a potential conflict in using the plural "personnel", when the position requirements apply to a singular person seeking professional qualification. The CC does not propose what the singular reference will be, either "Person," or other approach to reference a singular person to be determined by the technical committee.

Related Item

- Global revisions

Submitter Information Verification

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Submittal Date: Tue Dec 20 14:56:38 EST 2022
Committee: PQU-FFQ

Committee Statement

Committee Action: Rejected but see related SR

Resolution: [SR-1-NFPA 1010-2023](#)

Statement: The term "support personnel" was changed to "support person" throughout NFPA 1010 to more accurately describe the individual person seeking professional qualification. Using the plural "personnel," when the position requirements apply to a singular person seeking professional qualification could cause confusion. Using the singular "support person" will prevent unnecessary confusion.



Public Comment No. 2-NFPA 1010-2022 [Section No. 1.1.2]

1.1.2 Support Personnel.

~~Chapter 4 identifies~~ Chapter 4 identifies the minimum job performance requirements (JPRs) for support personnel professional qualifications.

Statement of Problem and Substantiation for Public Comment

Spaces added

Related Item

• spaces added

Submitter Information Verification

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Submittal Date: Tue Nov 01 12:57:03 EDT 2022

Committee: PQU-FFQ

Committee Statement

Committee Action: Rejected but see related SR

Resolution: [SR-23-NFPA 1010-2023](#)

Statement: This second revision consists of the following two parts: (1) The creation of a new Chapter 4 titled, "General Requirements," the movement of the scope (1.1.1 through 1.1.7), purpose (1.2.1 through 1.2.7), and application (1.3.1.2 through 1.3.7.2) statements from Chapter 1 to the new Chapter 4, and (2) Revisions to the requirements within the new Chapter 4.

(1) Creation of new Chapter 4 ("General Requirements") and movement of the scope, purpose and application statements:

The position-specific general requirements were moved from Chapter 1 to a new Chapter 4. This new Chapter 4 will consolidate all the general requirements (scope, purpose, application, and continuing education) for each position identified in the standard within a single chapter. This will simplify any cross-references to those requirements throughout the standard. This move will also help to highlight the "road map" to the newly consolidated standard in existing Section 1.3, so that readers can easily find the requirements they are looking for. Editorial revisions were made to change any existing statements of fact into requirements (i.e., "shall" statements).

New scope and purpose statements were added to 1.1 and 1.2, respectively, to represent the JPRs for each position included in this consolidated edition of the standard.

The statements of "scope" in sub-sections 1.1.1 through 1.1.7, "purpose" in sub-sections 1.2.1 through 1.2.7, and "application" in sub-sections 1.3.1 through 1.3.7 (with the exception of 1.3.1.1/A.1.3.1.1) were moved from Chapter 1 to a new Chapter 4. This new Chapter 4 will contain the general requirements for each position in the standard. This change will align the style and format of Chapter 1 with the rest of NFPA's consolidated standards for emergency response and responder safety (ERRS) and eliminate confusion for users of the standard.*

A.1.3 was moved to the new Chapter 4 (new 4.4.1) to introduce the other application statements (1.3.1 through 1.3.7), which were moved from Chapter 1 to Chapter 4.

1.3.1.1/A.1.3.1.1 became 1.3/A.1.3, and the language was revised to align with the updated recommended editorial template for consolidated standards.

*Additional information on NFPA's ERRS Document Consolidation Project is available at www.nfpa.org/errs.

(2) Revisions within the new Chapter 4 ("General Requirements"):

A new administration statement (4.1) was added to explain how the new Sections 4.2 through 4.5 should be applied to candidates.

The words "professional qualifications" were deleted from 4.2.2, 4.2.3.1, and 4.2.3.2 (Support Personnel, FF I, and FF II) to match the style of the other scope statements in Section 4.2 [e.g., EMS (4.2.4), Fire Apparatus Driver/Operator (4.2.5), Airport Firefighter (4.2.6), and Land-Based Marine Firefighter (4.2.7)]. Check to make sure position title is updated.

4.3.5.1 (formerly 1.2.5.1) was revised to read "...minimum JPRs for service as a fire apparatus driver/operator." This change provides consistency with the sentence structure and style of the other position purpose statements in Section 4.3.

4.3.7.1 (formerly 1.2.7.1) was revised to align with the sentence structure and style of the other position purpose statements in Section 4.3.

4.4.2 (formerly 1.3.2.1) was revised to align with the sentence structure and style of the other position application statements in 4.4.

An editorial revision was made to remove the words "or equivalent program" from 4.4.1.11. This revision corrects an error from the first draft meeting, when the words were inadvertently left in the final first revision of the text.

1.3.5.1.1 (now 4.4.5.1) and 1.3.5.1/A.1.3.5.1 were moved to the new Chapter 4 and combined to create a new 4.4.5.1. This change will eliminate redundancy and provide consistency with the sentence structure and style of the other position application statements in Section 4.4.

1.3.6 and 1.3.6.2 were moved to Chapter 4 and combined to become 4.4.6. This change will eliminate redundancy and provide consistency with the sentence structure and style of the other position application statements in Section 4.4.

1.3.7 and 1.3.7.2 were moved to Chapter 4 and combined to become 4.4.7. This change will eliminate redundancy and provide consistency with the sentence structure and style of the other position application statements in Section 4.4.

The terminology for land-based marine firefighters was revised throughout the new general requirements chapter to provide consistency throughout the standard. These changes align with a separate second revision, which adds a definition of the term to Chapter 3 and updates the language throughout the other chapters of the standard.



Public Comment No. 9-NFPA 1010-2022 [Section No. 5.1]

5.1 General.

For qualification as Firefighter I, the candidate shall meet the requirements in Chapter 1, 5.1.1 through 5.5.2, and the requirements defined in Chapter 7 and Sections 9.2 and 9.6 of NFPA 470.

5.1.1* General Knowledge Requirements.

The organization of the fire department; the role of the Firefighter I in the organization; the mission of fire service; the fire department's standard operating procedures (SOPs) and rules and regulations as they apply to the Firefighter I; the value of fire and life safety initiatives in support of the fire department mission and to reduce firefighter line-of-duty injuries and fatalities; the role of other agencies as they relate to the fire department; the signs and symptoms of behavioral and emotional distress; aspects of the fire department's member assistance program; the importance of physical fitness and a healthy lifestyle to the performance of the duties of a firefighter; the critical aspects of NFPA 1500.

5.1.2 General Skill Requirements.

The ability to don personal protective clothing, doff personal protective clothing, perform field reduction of contaminants and prepare for reuse, hoist tools and equipment using ropes and the correct knot, and locate information in departmental documents and standard or code materials.

General Section layout

5.1 General

5.1.1 Qualification.

Requirements in Chapter 1 - Administration, 5.1.1 through 5.5.2 and the requirements defined in Chapter 7 - Emergency Medical Services and Sections 9.2. and 9.6 of NFPA 470 - Hazardous Materials/Weapons of Mass Destruction (WMD) Standard for Responders.

5.1.1.1 Duties

These requirements shall be divided into four major duties: Fire department Communications, Fireground Operations, Rescue Operations and Preparedness and Maintenance.

5.1.1.2 Function.

The function of a Firefighter level I is part of an integral team to accomplish tasks under supervision in meeting the incident priorities of life safety, incident stabilisation, and property conservation.

5.1.1.3 General Knowledge Requirements

As per above

5.1.1.4 General Skill Requirements

As per above

5.1.2 Occupational Health

The job performance requirement of this chapter shall be accomplished in accordance with the requirements of the authority having jurisdiction and NFPA 1500.

Statement of Problem and Substantiation for Public Comment

Difficult at locating specific informations in the General Section from one chapter to another chapter with the exception of chapter 15 Airport FF 1003. By formalizing each chapter like chapter 15 would ease the readers toward locating specific informations.

Related Item

• PI

Submitter Information Verification

Submitter Full Name: Pierre Blackburn

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Submittal Date: Wed Dec 21 09:02:31 EST 2022

Committee: PQU-FFQ

Committee Statement

Committee Action: Rejected

Resolution: The general requirements for professional qualification as Firefighter I are already clearly defined in Section 5.1.

**Public Comment No. 12-NFPA 1010-2022 [Section No. 5.3.10(B)]****(B) Requisite Skills.**

~~The ability to prevent water hammers when shutting down nozzles~~ Operate nozzles effectively; open, close, and adjust nozzle flow and patterns; apply water using direct, indirect, and combination attacks; advance charged and uncharged 1½ in. (38 mm) diameter or larger hose lines up ladders and up and down interior and exterior stairways; extend hose lines; replace burst hose sections; operate charged hose lines of 1½ in. (38 mm) diameter or larger while secured to a ground ladder; couple and uncouple various handline connections; carry hose; attack fires at grade level and above and below grade levels; and locate and suppress interior wall and subfloor fires.

Statement of Problem and Substantiation for Public Comment

Water hammer is not as grave of an issue in small hand lines as previously thought, especially with modern pumps and electronic governors.

Related Item

- Water application

Submitter Information Verification

Submitter Full Name: Andrew McIntyre

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Submittal Date: Sat Dec 31 21:44:38 EST 2022

Committee: PQU-FFQ

Committee Statement

Committee Action: Rejected

Resolution: 5.3.10 is not limited to small hand lines only. Water hammer is still an issue facing firefighters in the field. Many apparatus do not have the modern pumps or electronic governors to prevent damage from the effects of the water hammer.

**Public Comment No. 11-NFPA 1010-2022 [Section No. 5.3.13(A)]****(A) Requisite Knowledge.**

Types of fire attack lines and water application devices most effective for overhaul, water application methods for extinguishment- ~~that limit water damage~~, types of tools and methods used to expose hidden fire, dangers associated with overhaul, obvious signs of area of origin or signs of arson, and reasons for protection of fire scene.

Statement of Problem and Substantiation for Public Comment

Limiting water damage shouldn't be a primary concern, putting the fire out needs to be.

Related Item

- Water application

Submitter Information Verification

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Submittal Date: Sat Dec 31 21:43:37 EST 2022

Committee: PQU-FFQ

Committee Statement

Committee Action: Rejected

Resolution: 5.3.13 applies to the overhaul phase, which does place an emphasis on limiting water damage.



Public Comment No. 7-NFPA 1010-2022 [Section No. 15.1]

15.1 General.

15.1.1 Qualifications.

To be qualified as an Airport Firefighter, the candidate shall meet the requirements defined in Chapter 1(**1010 Administration**), Chapter 6(**1001 Firefighter II**), and Sections ~~15.1 through 15.4~~.

~~15.1.1.1 – Duties:~~

~~These requirements shall be divided into three major duties: response, fire suppression, and rescue.~~

~~15.1.1.2 – Function:~~

~~The primary function of the Airport Firefighter shall be to execute fire suppression and rescue activities.~~

~~15.1.1.3 – General Knowledge Requirements:~~

~~Fundamental aircraft firefighting techniques, including the approach, positioning, initial attack, and selection, application, and management of the extinguishing agents; limitations of various sized hand lines; use of personal protective equipment (PPE); fire behavior; firefighting techniques in oxygen-enriched atmospheres; reaction of aircraft materials to heat and flame; critical components and hazards of civil aircraft construction and systems related to ARFF operations; special hazards associated with military aircraft systems; a national defense area and limitations within that area; characteristics of different aircraft fuels; hazardous areas in and around aircraft; aircraft fueling systems (hydrant/vehicle); aircraft egress/ingress (hatches, doors, and evacuation chutes); hazards associated with aircraft cargo, including dangerous goods; hazardous areas, including entry control points, crash scene perimeters, and requirements for operations within the hot, warm, and cold zones; and critical stress management policies and procedures.~~

~~15.1.1.4 – General Skills Requirements:~~

~~Don PPE; operate hatches, doors, and evacuation chutes; approach, position, and initially attack an aircraft fire; select, apply, and manage extinguishing agents; shut down aircraft systems, including engine, electrical, hydraulic, and fuel systems; operate aircraft extinguishing systems, including cargo area extinguishing systems.~~

~~15.1.2 – Occupational Safety and Health:~~

~~The job performance requirements of this chapter shall be accomplished in accordance with the requirements of the authority having jurisdiction and NFPA 4500.~~

~~(1003 Airport Firefighter) 15.1 through 15.4.~~

Statement of Problem and Substantiation for Public Comment

Identify chapters qualification by inserting NFPA standards. By identifying standards in the qualification section will make it easier for readers without having at researching chapter # in table of contents.

Related Item

- PI

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Submittal Date: Wed Dec 21 08:49:57 EST 2022

Committee: PQU-FFQ

Committee Statement

Committee Action: Rejected

Resolution: Spelling out the duties and functions for Airport Firefighter is important due to the highly technical nature of the position. Deleting 15.1.1.1, 15.1.1.2, 15.1.1.3, 15.1.1.4, and 15.1.2 would remove the key knowledge and skill requirements from Chapter 15.

**Public Comment No. 5-NFPA 1010-2022 [Section No. 15.1.1 [Excluding any Sub-Sections]]**

To be qualified as an Airport Firefighter, the candidate shall meet the requirements defined in Chapter 1, Chapter 6, and Sections 15.1 through 15.4.
[Define chapter 6 requirement: Chapter 6 \(Firefighter II NFPA 1001\)](#)

Statement of Problem and Substantiation for Public Comment

No requirement at cross referencing "Chapter 6" .In the table of contents: NFPA 1010 identify each chapters associated to specific standard.

Related Item

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Submittal Date: Wed Dec 14 08:25:57 EST 2022

Committee: PQU-FFQ

Committee Statement

Committee Action: Rejected

Resolution: The general requirements for professional qualification as Firefighter II are already clearly defined in Chapter 6.



Public Comment No. 10-NFPA 1010-2022 [New Section after A.8.2.1]

A.8.2.1 (2) Braking System

For vehicles equipped with air brakes, the driver-operator should be capable of performing a full air-brake service test as identified in 49 CFR 383.113(a)(2) ([https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-383#p-383.113\(a\)\(2\)](https://www.ecfr.gov/current/title-49/subtitle-B/chapter-III/subchapter-B/part-383#p-383.113(a)(2))), related to required skills for drivers of air-brake-equipped vehicles. At a minimum, the tests should include the following:

- (1) Test air leakage rate
- (2) Test low pressure warning signal
- (3) Check that spring brakes come on automatically
- (4) Check air rate of air pressure buildup
- (5) Check air compressor governor cut-in and cut-out pressures
- (6) Test parking brakes
- (7) Test service brakes

Additional Proposed Changes

<u>File Name</u>	<u>Description</u>
PUB_223.pdf_extract.pdf (https://www.dot.state.pa.us/public/DVSPubsForms/BDL/BDL%20Manuals/Manuals/Commercial%20Drivers%20Manual/Comm%20Manual%20English)	These pages are from PA DOT PUB 223 - COMMERCIAL DRIVER'S MANUAL This is an example of additional explanatory material that could be included.

Statement of Problem and Substantiation for Public Comment

In many locales, operators of fire apparatus are exempt from obtaining a commercial driver's license (Pennsylvania is an example) and therefore may or may not be required to be specifically trained and tested on air brakes. Operators of ANY vehicle meeting the definition of a Federal DOT CMV must know how to perform an air brake test to ensure that the brakes are operational, and the vehicle is safe to operate, so the standard should specifically address this topic.

Related Item

- Further define the capability

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Submittal Date: Sat Dec 24 11:13:22 EST 2022
Committee: PQU-FFQ

Committee Statement

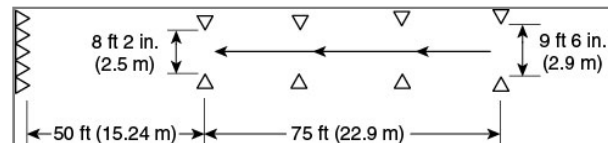
Committee Action: Rejected but see related SR
Resolution: SR-64-NFPA 1010-2023
Statement: A new Annex A section was added to provide additional clarification on the existing braking system requirements [8.2.1(2)], including a recommended best practice for performing a full air brake service test.


Public Comment No. 3-NFPA 1010-2022 [Section No. A.8.3.5]
A.8.3.5

The diminishing clearance exercise can be used as practice for meeting or in the evaluation of this requirement. This exercise measures a driver's ability to steer the apparatus in a straight line, to judge distances from wheel to object, and to stop at a finish line. The speed at which a driver should operate the apparatus is optional, but it should be great enough to necessitate quick judgment. This exercise is to be performed both forward and in reverse with a spotter. The course for this exercise is created by arranging two rows of markers to form a lane 75 ft (22.9 m) long. The lane varies in width from 9 ft 6 in. (2.9 m) to a diminishing clearance of 8 ft 2 in. (2.5 m). The driver should maneuver the apparatus through this lane without touching the markers. The vehicle should be stopped at a finish line 50 ft (15.24 m) beyond the last marker. No portion of the vehicle should protrude beyond this line. Vertical clearance judgment should be evaluated using a prop with a crossbar that is adjustable, based on the vehicle height. During the evaluation, the driver should drive forward and back through the prop with the crossbar at several differing heights, including one that is lower than the top of the vehicle. The prop should not be struck. The intent of the vertical clearance judgment is for proper identification of the furthest point in the form of the apparatus. In situations where the apparatus is gaining entry to roadways or limited-height areas, the driver/operator must allow appropriate space ahead of the apparatus in order to avoid striking objects or to avoid extending apparatus into traffic lanes. (See Figure A.8.3.5.)

Note that for large vehicles, such as ARFF apparatus, this course might need to be modified.

Figure A.8.3.5 Diminishing Clearance Exercise.


Statement of Problem and Substantiation for Public Comment

The legal width for commercial vehicles is 8'6" in most states and provinces (<https://coast2coasttruckingpermits.com/state-province-legal-limits/>). Most modern fire apparatus are wider than the 8'2" currently used in the standard for the diminishing clearance skill. Establishing a minimum clearance obstacle that is narrower than legal vehicle width results in the driver-operator being unable to complete the skill successfully. The standard should establish the minimum width in the diminishing clearance at 8'10" (8'6" + 2" inches on each side) to allow for modern fire apparatus.

Additionally, the US Federal Highway Administration establishes no legal width for emergency vehicles:

"WIDTH REQUIREMENTS

The maximum width limit for CMVs on the NN and reasonable access routes was originally established at 102 inches, except for Hawaii where it is 2.74 m (108 inches). (See discussion of Reasonable Access on page 12.) To standardize vehicle width on an international basis, the 102-inch width limit was interpreted to mean the same as its approximate metric equivalent, 2.6 meters (102.36 inches) (Figure 1).

Federal width limits do not apply to special mobile equipment, which consists of self-propelled vehicles not designed or used primarily for the transportation of persons or property and only incidentally moved over the highways. Special mobile equipment includes the following, when moving under their own power: military or farm equipment; instruments of husbandry; road construction or maintenance machinery; and emergency apparatus, including police and fire emergency equipment. Federal rules do not require States to issue over width permits before allowing operation of special mobile equipment. However, if States wish to allow other vehicles more than 102 inches wide (i.e. non-special mobile equipment) to operate on the NN, then States must issue special over width permits." (https://ops.fhwa.dot.gov/freight/publications/size_regs_final_rpt/#:~:text=This%20Act%20provided%20a%20maximum,on%20the%20Interstate%20highway%20system.)

Please note the commentor agrees that a driver-operator needs to be aware of the vehicle's dimensions and be able to operate the vehicle safely.

Related Item

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Submittal Date: Mon Nov 07 04:47:58 EST 2022

Committee: PQU-FFQ

Committee Statement

Committee Action: Rejected but see related SR

Resolution: [SR-28-NFPA 1010-2023](#)

Statement: The recommendation to use a spotter was removed from 8.3.5(A) and A.8.3.5(A) to align the Annex A material with the requirements of the JPR (8.3.5). 8.3.5 requires a forward maneuver only; it does not require a reverse maneuver.

The width requirements for the diminishing clearance exercise in A.8.3.5 and Figure A.8.3.5 have been revised to account for the variation in widths of fire department vehicles.