NATIONAL FIRE PROTECTION ASSOCIATION
The leading information and knowledge resource on fire, electrical and related hazards

Via email: Personal Email / Ex. 6

August 10, 2018

Re: Submission of request for project initiation to address chemical additives in both personal protection ensembles and station wear for the fire service

Dear Ms. Cotter:

NFPA would like to once again extend our thanks for your interest in NFPA's standards development process and your passion behind seeking standards development. Standards Administration has received your most recent resubmission of a request for project initiation to:

1. Identify and label "chemical additives" in wearable structural and wildland fire gear (NFPA 1971, *Standard on Protective Ensembles for Structural Fire Fighting and Proximate Fire Fighting*);
2. Identify and label chemical contents in amounts so that an end user is aware of the chemicals worn during the fire fighter's duties;
3. Identify and label chemical additives in station wear (NFPA 1975, *Standard on Emergency Services Work Clothing Elements*);
4. Adopt ECHA standards of not more than 35 ppb PFOA and 1 ppm precursor in personal protective equipment; and
5. Mandate disclosure of any chemicals labeled as "Contaminate of Emerging Concern" which are used in the manufacturing or as an end result of production.

NFPA is diligent in its role as facilitator of standards development to ensure that current editions of our codes and standards address known safety concerns supported by research, studies, technological innovations and expertise of participants in our process: both committee members and those who participate by submission of Public Input and Public Comments for the committee's consideration. As part of the development of NFPA standards, often other national and international standards (such as the ECHA) are reviewed and referenced.

Through our open, transparent, and balanced consensus process, the substance of NFPA standards are developed not by NFPA staff directly but by experts from around the world who are committed to reduce risks and establish minimum safety requirements through four stages: Public Input, Public Comment; Association Technical Meeting; and Standards Council Issuance

(including the hearing of appeals). Although NFPA administers the process for developing the standards, it has no authority to mandate action by manufacturers, organizations or others. Such action is beyond the scope of authority of a standards development organization.

As previously communicated to you (in correspondences sent May 1st and June 27th, copies of which are attached), at its April meeting the Standards Council approved the development of requirements for contamination control of personal protective equipment, accessories, and equipment. The Task Group created by the Standards Council to address contamination issues beyond requirements and practices currently within NFPA Standards met in June. The report of results and recommendations from the Task Group, including any plan for standards development activity, will be provided to the NFPA Standards Council at its August 13-15, 2018 meeting. The Council's decision regarding such recommendations will be included in the minutes of the August 2018 meeting and will be posted following the meeting at https://www.nfpa.org/Codes-and-Standards/Standards-development-process/Standards-Council/Agendas-Minutes-and-Decisions/2018-Standards-Council-Meetings).

As we have done in the past, we again, encourage you to participate in NFPA's standards development process as the projects addressing contamination and contamination control progress by suggesting proposed language for inclusion in (or removal from) NFPA 1971 and NFPA 1975 along with whatever documentation you may have to substantiate your proposed changes. NFPA staff can assist you and answer any questions you may have as you submit your proposals. You can reach the Standards Administration staff at 617-984-7246. I am also including the link to instructions for submitting a Public Input (PI) or Public Comment (PC) on NFPA documents, for your convenience.
http://www.nfpa.org/codes-and-standards/standards-development-process/how-the-process-works/step-1-input-stage.

All submitted, proposed text and related substantiation is reviewed and considered by the responsible Technical Committee(s) as the standards process through their respective revision cycles. NFPA 1971 is currently open for the submission of Public Input and it is anticipated that NFPA 1975 will open for submission of Public Input before year's end.

As you have indicated an urgency in requiring identification and labeling of chemical additives to be included within NFPA standards, you may choose to file a Tentative Interim Amendment ("TIA") for immediate consideration by Technical Committees. A TIA is a mechanism within the NFPA standards development process which allows for amendments to be included in the standard between full revision cycles. The public may review and submit comments on the TIA, and the Technical Committee is balloted on both technical merit of the proposed text and the emergency nature (in accordance with the *NFPA Regulations Governing the NFPA Standards Development Process*, Section 5.4). For issues #1-4 included in your proposal for project initiation, this would be an available option for seeking change within the respective NFPA standards. The Standards Council reviews all comments submitted and the recommendation of the Technical Committee's ballot results in determining whether to issue a TIA. This process typically takes 3-4 months from submission through Standards Council action.

Should you need assistance or have additional question regarding the NFPA standards development process and how to participate, please contact our Standards Administration staff at 617-910-7246.

In closing, thank you for your efforts to address health concerns for firefighters and to increase safety for responders through the development of robust standards.

Respectfully,

Christian Dubay
Vice President and Chief Engineer

Attachments: e-mail correspondence w/ attached letter dated 5/1/18
e-mail correspondence dated 6/27/18

Dunn, Barbara

From: Maynard, Mary
Sent: Tuesday, May 1, 2018 12:26 PM
To: Maynard, Mary
Subject: NFPA Standards Council Action re Proposed Project on Contamination Control of Personal Protective Equipment (PPE), Accessories, and Equipment
Attachments: 18-4-11.pdf

To: Submitters of Public Comments on Proposed Project on Contamination Control of Personal Protective Equipment (PPE), Accessories, and Equipment

You are receiving this correspondence in response to a public comment you submitted on the proposed project. Please see the enclosed action taken at the April 10-11, 2018 NFPA Standards Council Meeting.

Sincerely,

Mary Maynard Davy

Standards Council Administrator | NFPA

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Quincy, MA 02169-7471

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mmaynard@nfpa.org <mailto:mmaynard@nfpa.org>

www.nfpa.org <http://www.nfpa.org/>

c: G. Colonna, E. Conlin, J. Montes

18-4-11

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NATIONAL FIRE PROTECTION ASSOCIATION
The leading information and knowledge resource on fire, electrical and related hazards

April 27, 2018

Lieutenant David Bernzweig
Columbus (OH) Division of Fire
444 Brookside Drive
Columbus, OH 43209

VIA EMAIL: dbernzweig@oapff.org

Dear Lieutenant Bernzweig:

I am transmitting to you herewith the following action of the Standards Council (April 10-11, 2018):

The Council reviewed the request of David Bernzweig, Columbus Firefighters Union, to develop a standard to establish the minimum requirements for the effective contamination control of personal protective equipment (PPE), accessories, and equipment.

After review of all the information provided, the Council voted to approve the development of requirements for contamination control of personal protective equipment, accessories, and equipment. The Council noted that there were several ways to approach the development of contamination control requirements, such as developing a new standard or including the requirements within existing standard(s) and the Council recognized that it was important to identify appropriate expertise. Therefore, the Council directed NFPA Staff to form a task group that includes the chairs of individual technical committees which currently address contamination and/or contamination control in standards, or which will be directly impacted by the development of requirements for contamination control. The Task Group shall report back to the Council in August with a detailed path forward on how to develop requirements for contamination control of personal protective equipment, accessories, and equipment (i.e. whether within an existing standard, a new stand-alone standard, a new committee, or assign to a current committee; and how to address correlation).

The Task Group will be chaired by Standards Council Member Gary Keith, Vice President-Engineering Standards at FM Global.

The Council noted that given the urgency to establish requirements for contamination control, for those committees that have requirements that currently address contamination control or are in the process of developing new or revised requirements during the current revision cycle, the Council encourages those committees to continue their work.

Very truly yours,

Linda Fuller, Senior Manager, Standards Operations, Standards Administration
and Standards Council Recording Secretary

c: D. Baio, G. Colonna, E. Conlin, P. Foley, J. Montez
Interested Parties
18-4-11

Dunn, Barbara

From: Maynard, Mary
Sent: Wednesday, June 27, 2018 4:06 PM
To: d
Cc: Conlin, Edward; Montes, John
Subject: Submission of request for project initiation to address chemical additives in both personal protection ensembles and station wear for the fire service

June 27, 2018

Ms. Diane Cotter

Re: Submission of request for project initiation to address chemical additives in both personal protection ensembles and station wear for the fire service

Dear Ms. Cotter:

Thank-you for your interest in NFPA's standards development process and your proposal requesting that NFPA initiate standards development to address chemical additives in both personal protection ensembles and station wear for the fire service.

As you are aware, from correspondence sent to you on May 1, 2018, the Standards Council voted to approve the development of requirements for contamination control of personal protective equipment, accessories, and equipment. A task force has been formed to address contamination and contamination control in current NFPA standards and will be reporting to the NFPA Standards Council at the August 13-15, 2018 meeting with a recommended, detailed path forward. The Council's decision and direction will be included in the minutes of the August 2018 meeting which will be posted and available for review at https://www.nfpa.org/Codes-and-Standards/Standards-development-process/Standards-Council/Agendas-Minutes-and-Decisions/2018-Standards-Council-Meetings

I encourage you to participate in NFPA's standards development process as the projects addressing contamination and contamination control progress. The genesis of any change in NFPA standards is through proposals of specific text which

you may submit as Public Input (PI) and Public Comment (PC). The proposed text submitted by individuals such as you, interested in advancing life and fire safety, will be reviewed and considered by the responsible Technical Committee.

I have provided a link below that outlines how to submit a Public Input (PI) or Public Comment (PC) on NFPA documents that I believe will be helpful to you http://www.nfpa.org/codes-and-standards/standards-development-process/how-the-process-works/step-1-input-stage. Should you need assistance or have additional question regarding the NFPA standards development process and how to participate, please contact our Standards Administration staff at 617-910-7246.

Again, thank-you for your interest in increasing safety through standards. Best regards and,

Sincerely,

Dawn Michele Bellis

Director, Administration

and NFPA Standards Council Secretary

c: E. Conlin, J. Montez

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