

"THE TWO IN, TWO OUT RULE"

Significant Changes for Fire Services Employers

The Respiratory Protection Standard at 29 CFR 1910.134(g)(3) specifies procedures to be followed when respirator use is required in IDLH atmospheres. These procedures must provide for standby personnel immediately outside the IDLH atmosphere with appropriate training and rescue equipment to provide effective rescue and ensure that positive communications are maintained between the individual(s) in the IDLH atmosphere and those outside. Radio communications have been shown to be unreliable in past cases, the standard requires that "Voice, Visual or Signal Line" communications be maintained between those individuals working in the IDLH atmosphere and those outside. Radio communications are permitted to maintain the structure and those inside the structure, provided that the written protocol does not rely solely on the individuals inside the structure signaling for help. The procedures outlined in the employer's respiratory protection communications must be made frequently enough to ensure the safety of those working in the structure.

The provisions of 29CFR191 O.134(g)(4) apply to Interior Structural Fire Fighting in *addition* to the requirements of paragraph (g)(3). The employer must ensure that employees entering the structure work in a mutually supporting team of at least two, and that there are at least two individuals present with suitable rescue equipment at the nearest safe area.

The two individuals inside the structure must stay together, communicating and maintaining contact so that if one individual undergoes some difficulty the other is there to assist. These two individuals may not maintain contact with each other by radio. This mutually supporting team of at least two must have some means of communications with an individual outside the IDLH atmosphere who will monitor their safety and have at least two appropriately trained individuals, in the appropriate respiratory and personal protective equipment available to immediately assist those inside the structure.

The individuals outside the structure are permitted to perform other duties as long as those duties do not interfere with their ability to make an immediate response to a call for assistance or take them away from the nearest safe area. The incident commander will be responsible for determining if he or she has adequate number of personnel on scene to meet this requirement before interior operations are implemented. The Department has determined that the Pump Operator will jeopardize the safety and health of others at the incident if he or she abandons his or her duties, making the Pump Operator ineligible to be one of the two standby persons. The written respiratory protection program must contain a specific written procedure, which explains how these requirements will be met. Ideally, the written procedure will identify the duties a rescue team member can perform. The test of compliance will be if the duties can be

abandoned to perform a rescue without endangering the safety and health of anyone on the fire ground. The standard provides for an exception to the requirements of paragraph (g)(4) in that rescue activities may be initiated prior to the assembling of four individuals if it is necessary to prevent the loss of life or serious injury. PESH expects that incident commanders will exercise common sense and ensure that every building which presents a life hazard or suspected life hazard is promptly searched for victims when in his or her professional judgment it is necessary prior to assembling four individuals. PESH also expects that in these instances the 2-in/2-out practices will be implemented as personnel become available on the scene. It should be made very clear to employers that it is not the intent of these requirements to restrain the incident commander from beginning rescue activities when his or her professional judgment indicates there is a possibility that the involved structure could be occupied.

In instances where an injury to, or the loss of: a firefighter occurs while the exception was being followed, PESH will look at all issues surrounding the incident and if sound judgment was exercised by the incident commander no citation will be issued. While the exception was provided in the interest of assuring that civilians are afforded the rescue services they are entitled to, PESH does not expect that incident commanders will abuse exception to enter obviously vacant or abandoned structures prior to assembling enough firefighters to perform the work safely.

The requirements are performance oriented. Any program which assures that the above is met, is acceptable. The new standard in paragraph (1) specifies that employees must be fit tested once each year. The previous standard permitted a qualitative fit test. However, the new standard will require quantitative fit testing for respirators used in "Immediately Dangerous to Life or Health" (IDLH) atmospheres to ensure that an appropriate face piece to face seal can be obtained with the selected respirator.

Employers must be in compliance with these provisions by October 5, 1998 until that date; the 1in/2-out provisions of the old respiratory protection standard will be enforced allowing the same rescue exception. Previous documents outlining specific criteria for when the rescue exception can be utilized are hereby rescinded.

**I have read the above standards and fully understand them as part of the Port Gibson Fire Departments S.O.G.'s.

Signature: _____

Date: _____