



MI-WUK/SUGAR PINE FIRE PROTECTION DISTRICT

"Providing Quality Emergency Response and Fire Protection for the Public"

May 29, 2013

Occupational Safety and Health Standards Board
2520 Venture Oaks Way
Suite 350
Sacramento, CA 95833

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**OCCUPATIONAL SAFETY AND HEALTH
STANDARDS BOARD**

Regarding: Petition to Amend GISO 3408 Foot Protection (Structural Firefighting)

Dear Sir or Madam:

This letter is a petition requesting that the Occupational Safety and Health Standards Board (BOARD) amend the above referenced standard.

The existing standard at subsection (c) refers to a military specification that is outdated, no longer available, and is inconsistent with the current state of the art in structure firefighter protective footwear. I have searched on more than one occasion for a copy of that standard (MIL-B-2885D (5-23-73) and amendment dated 12-31-75) and am unable to find it! In the industry which manufactures structural firefighting turnout boots, the rubber boot to which this military specification refers is rapidly being replaced by leather based turnout boots. None of the leather based turnout boots appear to meet that military specification, but they all meet the more recent specifications for testing and use from the National Fire Protection Association (NFPA), as do all the rubber turnout boots currently available.

I am not an engineer; however the NFPA standard for structural firefighting boots (NFPA 1977, 2011 edition) appears to require testing for all the same elements as the military specification.

I am petitioning for an amendment to the current Cal-OSHA standard because it is my understanding and belief that the current standard is outdated, and does not sufficiently address the current state of the industry regarding personal protective footwear for structural firefighting. It is my understanding and belief that the leather based turnout boots currently available and which meet the stringent NFPA standards provide better protection to our employees.

I look forward to hearing from you regarding this petition. You can reach me at the telephone numbers listed in the footer before.

Sincerely,

Larry Crabtree
Interim Fire Chief