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**FRAMING DOCUMENT
VERSION 1.0
WUI/WILDLAND RESPIRATORY PROTECTION RULEMAKING
APRIL 15, 2022**

FOR CONSIDERATION BY THE CAL/OSHA WUI/WILDLAND RESPIRATORY
PROTECTION TECHNICAL ADVISORY COMMITTEE
FOR DISCUSSION PURPOSES ONLY

The objective of this rulemaking is to draft regulations under Title 8, California Code of Regulations (CCR) that will provide California's firefighters with effective protection from inhalation exposures to products of combustion during WUI/Wildland deployments. It is proposed that the rule will include two key elements:

Element A: Respiratory protection for firefighters during all phases of WUI/WL operations.

To meet this objective, the rule will need to provide for the following:

- (1) A phase-in period;
- (2) Firefighter participation in implementation decision-making;
- (3) Integration into incident command;
- (4) Practical functionality in the field;
- (5) Procedures for mandatory versus non-mandatory use;
- (6) Reasonable flexibility in on-scene decision-making by supervisors;
- (7) Cleaning, maintenance and readiness standards;
- (8) Training in use, maintenance and field limitations;
- (9) Tracking and documentation of problems encountered in the field;
- (10) Continuous improvement through dissemination of information from the field.

Element B: Accommodations to eliminate or significantly reduce inhalation exposures during rest and recovery periods.

To meet this objective, the rule will need to include requirements for the provision of fresh or properly filtered air in sleeping, eating and gathering areas for firefighters who are recovering between WUI/WL shifts.

Programmatic needs: There are three programmatic needs outside the rulemaking process that will be necessary to ensure the success of the rulemaking:

- (1) A respiratory protection field evaluation, followed by a larger pilot project, prior to implementation of the rule statewide;
- (2) A means for centrally receiving, tracking and disseminating information on problems and successes in the field; and,
- (3) A research component to track and disseminate information on firefighter health metrics and attitudes relative to these provisions.

The Respiratory Protection Technical Advisory Committee (TAC) will consider the above provisions and develop draft regulatory language.

The Division will work with stakeholders to support the above three programmatic needs.

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